



GMTIP RESPONSE TO PUBLIC COMMENTS

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Overview

The Minnesota Department of Transportation (MnDOT) released the Draft Greater Minnesota Transit Investment Plan (GMTIP) for formal public review and comment on August 29, 2016 and ended on October 14, 2016 along with the Statewide Multimodal Transportation Plan and the Minnesota State Highway Investment Plan. During the comment period, MnDOT staff presented at outreach opportunities and meetings with partners including Area Transportation Partnerships, Regional Development Commissions, Metropolitan Planning Organizations, and regional meetings with the transit systems to increase the response during the comment period.

In total, 42 stakeholders and individuals provided 109 distinct comments on the Draft GMTIP. This document summarizes the comments received and provides MnDOT’s responses to each point of feedback. Names of individuals and MnDOT’s key partners that submitted comments can be found in the Appendix of this document.

HOW TO USE THIS DOCUMENT

The main text of this document consists of GMTIP comments and MnDOT responses organized by theme. Each theme includes a brief summary of the comments and any action taken. Each comment has an ID number that corresponds to the stakeholder or individual that contributed the comment. The complete list can be found in the Appendix.



COMMENTS AND RESPONSES

Plan Development

MnDOT received several comments supporting the development process of the plan. Stakeholder noted the inclusive planning, efforts to include environmental justice communities, and supporting equity and access to transit services. No changes to the plan have been made from these comments.

ID	Comment on Plan Development	MnDOT Response
21	I support your goals.	MnDOT appreciates the effort taken to review the plan and submit a comment. This input is important to the process.
11	Achieving health equity for all people is a comprehensive endeavor; far more sweeping than just access to healthcare or health insurance. MnDOT's vision is commendable, as it specifically targets populations that experience health inequities. The vision of this document will help provide vulnerable populations reliable transportation to education, food, income/employment, health care, and a stable ecosystem - all necessary to realize a greater measure of health equity.	The commenter provides support for the vision of MDH as it is realized in this document. MnDOT has similar interests and hopes this plan reflect the priorities of MDH.
11	Overall the plan I feel is sound, and gives us at the least goals to strive towards. That being said, if we have this plan as a goal, and the tools are provided to us for advertising and helping to implement the mobile apps etc.... that this plans addresses, we should have no problem achieving this goal and quite possibly improving on it. I am encourage by this plan and see the state has put a lot of thought into this plan. I can also see that our mission of "Working Together to Strengthen the Quality of Life in our Communities" is supported in this plan.	MnDOT appreciates the effort taken to review the plan and submit a comment. This input is important to the process.
11	Policy focus for this report includes analysis of environmental justice concerns. Part of this analysis includes vulnerable populations, namely: minorities, the elderly, and persons with limited English proficiency, households with no cars, and persons with disabilities and persons with low incomes. This policy focus represents an important step in promoting health equity, by seeking to better understand and address the transportation needs of vulnerable populations.	MnDOT appreciates the effort taken to review the plan and comment on the importance of policy development based on environmental justice. MnDOT appreciates recognition of the equity analysis.
7	We greatly appreciate the work of staff and consultants in developing a new 20-year transit plan that acknowledges the need for increased service, takes into consideration developments like the Olmstead Plan and really strives to put in place measurable standards and outcomes that will allow more people to access public transit. We strongly support the overall goal of expanding service hours within existing transit systems. We also support efforts to work more closely with other providers and provide a more seamless system of transportation for our riders.	MnDOT appreciates the effort taken to review the plan and submit a comment. This input is important to the process.
11	This document, though not worded specifically as such, is an excellent example of advancing health equity through a health in all policies approach across all sectors; continuing investment in efforts that currently are working to advance	MnDOT has noted this comment and appreciates recognition of the role this plan can play in positive public health outcomes. Health equity will be included in Goal 5: to support the



ID	Comment on Plan Development	MnDOT Response
	health equity; and strengthening community relationships and partnerships to advance health equity.	Minnesota GO vision for an integrated multimodal transportation system.
11	The plan's objective is to improve mobility for the general public with emphasis on seniors, youth, low-income populations, homeless populations, people with disabilities, veterans, new commuters. This has direct public policy and funding implications to improve current Americans and health inequities across these populations.	MnDOT has noted this comment. Based on this and other input from the commenter, MnDOT has made some adjustments to the plan to acknowledge transit's impacts on public health.
13	The plans are reader-friendly and written in plain language. The technical subject matter is illustrated in a manner the public can understand and still makes the intended decisions.	MnDOT appreciates recognition of the legibility of the plan to many audiences.
13	MnDOT is to be commended for producing documents that are detailed, informative and strategic while remaining visually arresting. Use of call-out boxes, graphs, maps, pie charts and bubble images provide a visual underpinning to the sometimes heavy topic matter discussed in both documents. This helpful visualization frames the information in a different medium, leading to a clarity text alone cannot achieve.	MnDOT appreciates recognition of the strength of the plan and the Department's efforts to make the document accessible and easy to understand by diverse audiences.

Community Outreach and Marketing

MnDOT conducted extensive public outreach during the GMTIP's development. These included an on-board survey with existing riders, online survey that gathered priorities from transit and travel behavior, an origin and destination survey to understand trip patterns, a paper survey for the "hard to reach" population and tribal outreach including in-person meetings with three tribes and a participatory mapping exercise. Input total 6,378 responses from the different tools.

Generally speaking, comments related to the community outreach were positive. Stakeholders commented that the process was well organized and MnDOT attempted to reach different audiences including at risk populations during the process. Comments from transit agencies reinforced one of the plan's messages about improving the marketing of public transit to help boost ridership. Small changes to the plan include clarifying language about communication and marketing strategies.

ID	Comment on Community Outreach	MnDOT Response
22	<p>1. Please redo the community engagement process and reach across departments and topic areas: Healthcare, Aging ,Disabled, Family caregivers, Worker shortages (how to help get workers to their clients) DHS Dept. of Health Olmstead STS Medicaid MH Housing Strong and live able communities Food Access Workforce issues Race/ethnic concerns.</p> <p>2. Please, show the State a great example of how many agencies can and need to support each other. Healthcare and many other costs will significantly decrease if people have good access to transportation.</p>	An extensive outreach process was conducted, including outreach to hundreds of organizations as part of this plan. State agencies, nonprofits, and advocacy groups were engaged on topics including health care, people with disabilities, low-income families, and others. Special care was taken to reach traditionally underrepresented populations including communities of color and low-income families.
27	Accessibility must be a priority in outreach, as well. All promotional and planning materials made available to the public must be accessible, including to blind Minnesotans. Any online material must be digitally accessible, as well, if Minnesotans with disabilities are to make full use of this information.	MnDOT acknowledges that improved public information can be provided and MnDOT can expend its efforts to provide outreach. This suggestion was added to strategy 6.4



ID	Comment on Community Outreach	MnDOT Response
7	Cost for marketing new service – the plan calls for better public outreach and education of the public. We agree that this is critical, especially for new service that will not attract riders if it is not sufficiently marketed. MPTA members report that 5% or less of overall budgets are currently being used for marketing and outreach. With more pressure to expand this outreach, how will this cost be addressed?	Thank you for your comment. Starting in 2017, MnDOT will be working with transit systems to develop a statewide marketing campaign to increase awareness about transit. MnDOT will also support the systems in regional and local marketing plans for individual needs.
23	Goal 3: Foster connections between transit systems and customers to increase transit ridership using the following actions: You also need to advertise or publicize this information so that people know the services are out there and how best to access the service. I had to really search to find my county's transit options. If more knew about the service, more would be able to use it!	MnDOT has noted this concern. Transit agencies and stakeholders discussed the importance of better information about transit services. MnDOT will be developing implementation strategies to address this issue.
11	MnDOT supported commendable outreach efforts to gather input from hard to reach populations.	MnDOT appreciates recognition of the thoroughness of the outreach process.
13	The public and stakeholder outreach/engagement for the plans is to be commended.	MnDOT has noted this comment and appreciates recognition of the thoroughness of the public outreach conducted.
4	Due to the fact that the on-board surveys were done in such a short time-span and hold a fair amount of weight in the final analysis, that future surveys should be done again before actually implementing additional and/or expanding services. The survey was quite thorough. However, to get a clearer picture per a specific community or area, doing it again could be advantageous.	MnDOT has noted this recommendation for future planning efforts.
11	MnDOT is to be commended for its recent innovations in public engagement including in-person engagement, online engagement, and engagement of traditionally underserved communities. With Minnesota's changing demographics (particularly with the two largest generation groups of baby boomers and millennials) and urbanization trends, continuing to improve public engagement efforts for prioritizing investments is critical to building and maintaining a transportation system that meets the needs of the traveling public. Some aspects of the changes and trends point to a less car-centric system and the interest in more transit-oriented development with more public transit options.	MnDOT has noted this comment and appreciates recognition of the thoroughness of the outreach process. In addition to the public engagement efforts made as part of the Investment Plan, MnDOT continues to seek opportunities to work with other departments through the Regional Transportation Coordination Councils and through ongoing outreach activities in Greater Minnesota.

Performance Evaluation and Monitoring

The majority of comments received about performance monitoring and evaluation were submitted by Greater Minnesota transit agencies. The agencies voiced their concern over reaching the performance standards, especially for new service and very rural service. The systems also noted their concern about using the 24 performance guidelines listed in the plan and the potential for increased reporting. MnDOT took these comments very seriously and determined that the chapter should be rewritten to address these concerns. The GMTIP released in March 2017, is the revised Performance Monitoring chapter and includes sections on state-level metrics that MnDOT will use and local-agency level metrics for each transit system to use, separate from MnDOT. The local level metrics are recommendations for best practice.

ID	Public Comment on Performance Evaluation	MnDOT Response
7	<p>In addition, certain performance measures for new service proposed in the Greater Minnesota Transit Investment Plan would make it extremely difficult for smaller systems to sustain much of an increase in service over current levels. The requirement for three passengers per hour for all new service greatly reduces the ability of smaller systems to provide new service. We strongly believe that performance measures need to be adapted to the very different situations faced by different transit systems. Larger systems in denser areas will be able to increase service while meeting strict performance measures but simply increasing service in urban areas will not meet the goal of the Olmstead Plan to improve access and move people with disabilities from segregated to integrated settings throughout the state.</p>	<p>The performance standards for productivity, using passenger per hour as a metric, serve as indicators of route performance and call attention to routes that may need to be adjusted. The productivity metric has been adjusted to account for both urban and rural environments. The access goal for public transit is to provide a consistent level of service in communities according to the span of service design guideline. The span of service describes the amount of service public transit could provide to meet the Olmstead goal. Other transportation options will need to be made available to this population to achieve the goal of integration.</p>
7	<p>Cost of tracking and reporting performance measures and cost of developing new service plans. How will systems that are currently under-staffed track and report on new performance measures as well as meeting FTA requirements for developing a safety plan and asset management plans?</p>	<p>The performance measures were selected based on the current set of reporting metrics the state receives. Much of the performance monitoring is an internal analysis not reported to the state level and already occurs with most transit systems.</p>
38	<p>Some of the requirements expected of rural transportation providers like ours in this area (Southwest Minnesota namely, Lincoln, Lyon, Redwood, Pipestone, Murray, Cottonwood, Jackson counties) are unrealistic and need to be amended. For example, expecting five passengers per hour on Route buses. And because of the number of miles between destinations in some of these rural counties, it is very difficult if not impossible to meet the requirements of a given number of passengers per hour. There are other areas as well those rural areas like this differ greatly from more urban areas. Even the term Greater Minnesota is a little misleading, since cities like Mankato are considered Greater Minnesota in the same way that Marshall is, but there is a huge difference in how rural each of these areas is.</p>	<p>MnDOT appreciates the commenter's careful review. MnDOT has noted this concern. The Plan provides different baselines and service standards for different types of services. The service standards are also flexible. For example, the passenger per hour is a "Route Average" that represents the average passengers per in service hour over the entire day. Individual hours may fall below the standard.</p> <p>Based on existing performance data, it is reasonable to expect that a deviated route operating within a small community will be more productive than rural demand response service in a sparsely populated area. The plan accounts for differences in communities and assumes different baselines and performance standards for services in Mankato versus Marshall.</p>
37	<p>Some of the systems that have volunteer services within their system do not report all of the hours that the volunteers are providing and also sway the ridership numbers due to the fact we are doing much longer rides with less people, somehow those hours should be captured. Looking at our particular system, we do report all van and all bus and track all of our volunteer hours so we average around the three rides per hour. Our in town ridership on the city buses all combined we are well over six rides per hour. Keeping in mind, these rides are no less needed within our service area than the in town rides and in some cases needed much more.</p>	<p>The performance standards for productivity, using passenger per hour as a metric, serve as indicators of route performance and call attention to routes that may need to be adjusted. The productivity metric has been adjusted to account for both urban and rural environments. The productivity reporting and monitoring are to be carried out at the local level, no additional reporting to the state is anticipated.</p>



7	<p>We are concerned about the hourly operating cost for the systems. What did you use for the basis of these amounts? I believe the average for all services was \$65.00 for 2017. In the Performance Measures and Standards presentation you have given it uses the figures of \$50.00/hr. for dial a ride, \$45.00/hr. for route deviation, and \$55.00/hr. for fixed route.</p>	<p>The performance standards are a local service evaluation tool. The cost per hour calculation is used as a system comparison measure as part of MnDOT's Decision Lens process. The performance standard for local use is cost per ride. The analysis method is to compare services within the transit system with this metric to determine those that exceed the system average significantly.</p>
7	<p>The Greater Minnesota Transit Investment Plan specifies four main performance measures:</p> <p>Ridership – ridership numbers that meet 90% of need by 2025. This should be a minimum goal and not seen as a ceiling for ridership. We believe the state should strive to meet all of the identified need. It is not clear from the plan what the ridership goal is for each system. Will targets be set for each system that specifically addresses ridership versus hours of service?</p> <p>Fleet Condition – 90% of fleet within useful life with minimum threshold of 80%. MPTA supports this goal and urges more rapid implementation given that in 2016, 22% of vehicles were beyond their useful life.</p> <p>Span of Service – 90% of systems meeting span of service schedules. Some of our members have concerns about a blanket approach to expanding the span of service. In some communities Sunday service or other expansion of service hours is not warranted and will not be supported locally. In addition, it is not clear how the span of service will be maintained if new service has to meet performance measures immediately including three riders per hour and other cost-efficiency measures. We would urge that new service be given two years before needing to meet performance measures so the service has time to become more established.</p> <p>Transit On-Time Performance – 90% of trips picked up within the appropriate time window by 2025. MPTA supports this goal. The plan further identifies 24 metrics for these main performance measures and states “The 24 metrics were developed in collaboration with the Greater Minnesota Transit providers throughout the planning process.” Some of our members expressed concerns about a number of the metrics included in the plan but those concerns were not addressed. The statement that the metrics were developed in collaboration with transit systems implies agreement with all of these metrics that does not exist.</p> <p>Specifically, some of our members have concerns about the passengers per service hour, the spare ratio, the cost per revenue hour, the cost per ride and the farebox recovery. MPTA does not support increasing the local share to 20% of operating cost while state statute requires 15% of operating cost be paid from local sources for rural service and service for elderly and disabled</p>	<p>The goal is for transit to meet 90% of demand by 2025, putting Minnesota on the path of meeting even greater demand in the future. The purpose of investing in a wide array of transit solutions is to meet the diversity of demands that exists. The Greater Minnesota Transit Investment Plan does not specify ridership targets or hourly targets separately for each system. MnDOT will work with individual systems to develop and refine ridership targets based on service levels. MnDOT has noted this support for the Fleet Condition performance measure. MnDOT has noted this issue and now clearly states in the plan that Sunday service is to be put in place if demand warrants it. MnDOT's approach is that baseline service span must be based on population and for this reason; the plan identifies different service spans depending on the community type and population. MnDOT also acknowledges that geography, employment levels and population characteristics are factors in ensuring services meet performance standards with expanded service hours. MnDOT notes the concern that new service must be given time to build ridership to allow it to meet performance standards. MnDOT has noted this support for the Transit On-Time performance measure MnDOT invited all transit providers to participate in the development of this plan and representatives from numerous transit agencies worked with MnDOT throughout the planning process. MnDOT has noted this concern that some transit providers may not support all 24 metrics and acknowledges that agreement by all operators on all 24 metrics is unlikely. These metrics will be tailored to different sizes of systems. MnDOT provides 80 to 85% of the funding through a combination of State and Federal programs. The local contribution is 15% in small urban and rural areas and 20% in large</p>

		urban areas and will remain so. No changes to the local share are proposed.
41	More in-depth discussion on the strategies to be used for improving service efficiency and sustainability using more aggressive performance measures and targets would be beneficial.	MnDOT acknowledges this comment. Because of the variation of operating environments and service providers in Greater Minnesota, MnDOT staff will provide individualized technical assistance as appropriate to assist transit providers in selecting and implementing strategies to meet the performance standards.
15	Additional amenities - waste bins, shelters, schedule / route information, direct connections between pedestrian and bicycle routes and transit.	This comment is noted. The Plan lays out targets for systems under the Provider Performance Standards in the Appendix for shelters, benches, and other customer amenities.
37	The same can be said about the vans, we limit our ridership when using the vans because we have at max seating of three riders in the vans and when the vans are used, they are doing the longer trips with less people.	Transit systems are required to report ridership each month on each route that is in their Service Level Plan in Black Cat. Black Cat can generate a report that shows how each route is performing. MnDOT recognizes that robust municipal service (5-8 passengers per hour is recommended) can offset the long trips in vans with lower productivity.
24	The plan reveals that a funding gap for transit will begin by 2021 and totals \$114 million through 2025. The expected gap is presumably wider in more distant years but specific numbers are not provided. The addition of substantive discussion on strategies to address the funding shortfall would improve the plan. The GMTIP recognizes the importance of population and employment density/clustering to support transit ridership. It would be beneficial to provide a substantive pathway in the plan to facilitate and measure appropriate urban land development patterns to support efficiency in transit patronage growth. The GMTIP provides an inventory of service providers and their characteristics. A number of performance measures/service standards with apparent targets are identified not only for safety and asset management, but also for ridership, on-time performance, span of service, and efficiencies. MnDOT's first priority is to ensure current level of service continues system-wide with subsequent efforts focused on expansion to match expectations for increases in span of service. More in-depth discussion on the strategies to be used for improving service efficiency and sustainability using more aggressive performance measures and targets would be beneficial.	Funding is clearly of major importance to continuing and potentially expanding transit services. MnDOT also wishes to be sensitive to the challenges of providing transit in Greater Minnesota, and changes to performance measures would require outreach to providers. MnDOT is charged with developing a fiscally constrained plan. MnDOT acknowledges the value of using urban land development patterns to support efficiency in transit patronage. For service design projects and feasibility studies, MnDOT considers land use and transportation performance measures. Density is not an appropriate measure in rural Minnesota as this plan focuses mostly on developing rural demand-response service. MnDOT recognizes this comment on the strategies used to improve service efficiency and sustainability. MnDOT prepared this plan with an eye on improving efficiency, and will provide additional discussion to clarify this in the document.
41	The GMTIP recognizes the importance of population and employment density/clustering to support transit ridership. It would be beneficial to provide a substantive pathway in the plan to facilitate and measure appropriate urban land development patterns to support efficiency in transit patronage growth.	MnDOT acknowledges this comment. The 2016 GMTIP calculates the investments needed to reach the target of meeting 90 percent of transit demand by 2025. By and large, this plan is addressing rural demand response transit where density is not necessarily an effective measure. Land development patterns are addressed



		separately in MnDOT's service and design projects.
41	<p><u>Utilize a joint land use and transportation performance measure:</u> The U.S. Census Bureau provides weighted population density data by distance from city hall for 366 Metropolitan Statistical Areas (MSAs) during the years of 2000 and 2010 (http://www.census.gov/population/metro/data/pop_pro.html). Increases in the metric signify higher levels of population clustering and have a stronger relationship than standard population density with lower personal vehicular usage and improvements in alternate travel modes of transit, bicycling, and walking. The plans could provide details on MnDOT working in partnership with local governments to improve urban form, while quantifying expected success using the weighted population density metric in addition to anticipated changes in measures such as mode splits, VMT and GHGs.</p>	<p>MnDOT acknowledges the value of using land use-transportation measures. For service design projects and feasibility studies, MnDOT considers joint land use and transportation performance measures. However, density is not an appropriate measure in rural Minnesota as this plan focuses mostly on developing rural demand-response service.</p>

Funding Outlook

The comments raised by stakeholders and transit systems voiced concern about two main topics including the ability of the transit systems to raise the local share needed to support their service, and the unpredictability of budgeting based on future forecasts. MnDOT understood these issues to be critical to stakeholders and decided to rewrite chapter 9, the Funding Outlook to address these issues. The updated chapter includes information about the local share, the breakdown of funding sources and projects the cost of operations and capital in both an expansion and fiscally constrained scenario.

ID	Comment on Funding	MnDOT Response
7	MPTA would like to work with the Office of Transit to explore exactly how funds are distributed to each public transit system. Our members agree with the practice of other peer states that provide a base amount of funding for each system in order to ensure more reliability of funding and a better ability to plan. The Office of Transit has encouraged systems to develop 5-year plans, but without any certainty as to future funding allocations, this is very challenging. Including MPOs and RDCs in the planning and distribution funds is something that Minnesota should consider.	MnDOT Office of Transit distributes funding each year based on the transit operators' application, which includes the budget. Budgets should show what it costs to operate the system for one year. Reductions may be made in the case of transit operators who do not spent their annual allotments. However, all reasonable requests are seriously considered.
41	The expected gap is presumably wider in more distant years but specific numbers are not provided. The addition of substantive discussion on strategies to address the funding shortfall would improve the plan.	Graphs on funding were developed on forecasted amounts – assuming that with current revenue flow, the funding gap will continue to grow at or higher levels than inflation. Assumptions for cost gaps beyond 10 years become very speculative, given the unknown economic forecast; therefore, the plan is updated every 5 years to continually update the cost gap for accuracy.
31	It will be very difficult for our transit agency to meet the local match to provide the extra service that is being asked for. Our City and County provides the local match for Capitol expenses. The transit agency must come up with the match for operating cost.	MnDOT will work with local transit properties to identify alternative local funding strategies
7	MPTA members have serious concerns about the ability and commitment of local governments to increase the local	MnDOT provides 80 to 85% of the funding through a combination of State and Federal programs. The local

ID	Comment on Funding	MnDOT Response
	<p>share of their budgets to allow for expansion of service. If MnDOT and the state insist on a 20% local contribution with significantly increasing budgets as the number of service hours is expanded, some systems simply will not be able to provide that level of local funding. Without the required local funding, service will not be increased to the levels set by the legislature or the Olmstead Plan.</p>	<p>contribution is 15% in small urban and rural areas and 20% in large urban areas. This is generally comprised of fare revenues, but can also include local contractual funds, funding from institutions or employers, and in some cases local general funds. Based on the peer review and evaluation of fare revenue performance across Greater Minnesota, these local contribution requirements are appropriate and achievable. Transit providers or jurisdictions that are unable to meet their local contribution receive technical assistance from MnDOT, and may need to evaluate performance, fare policies and service delivery strategies to ensure they can provide the local share. Service expansion is necessitated only for providers that are not meeting baseline service levels. The cost-effectiveness service standards are included to ensure services operate responsibly given costs and farebox revenues. Service expansion that meets the standards is expected to achieve the local contribution through farebox revenues. Thus, local cost increases should be matched by local revenue increases.</p>
4	<p>The statement, “MnDOT’s first priority for Greater Minnesota transit is to fund each system at a level sufficient to continue the current level of service and add additional hours to reach the baseline span of service”...should perhaps conclude by saying something to the affect...“as revenue sources remain secure in order to support such services”.</p>	<p>MnDOT appreciates the commenter’s careful review. This change has been made.</p>
7	<p>On the capital side, MPTA would encourage MnDOT to continue to list bus purchases in the 4-year STIP and treat those purchases as it treats all road and bridge projects in the STIP, namely with a strong commitment to honoring those plans. Again, systems need to be able to count on funding for capital in order to engage in long-range planning.</p>	<p>All FTA-funded projects must be in the STIP, including bus purchases.</p>
7	<p>MPTA members have identified a number of costs where it is not clear if these costs have been adequately estimated or if they are included in the cost calculations at all:</p> <ul style="list-style-type: none"> • Cost for facilities and capital equipment in addition to buses. How many systems will need bus garages, new or expanded washing and fuel equipment, etc. to properly maintain new and expanded vehicle fleets? • Cost for staffing – MPTA members report that attracting and retaining bus drivers and other staff is difficult due to low wages, lack of health insurance for part-time workers and the challenges of finding applicants with a CDL license. With significantly expanded service, systems will be forced to consider salary increases in order to provide the additional service. • Cost for health care – some systems report that health care costs are growing faster than any 	<p>A shortage of available, qualified drivers in rural areas was noted by a number of stakeholders early in the plan development process, and MnDOT acknowledges this issue, particularly as compared to Metropolitan Area drivers who have generally higher wages and benefits. MnDOT has funded wage overhauls for several rural systems and will continue to monitor this issue. It is in the interests of Minnesota communities to foster an employment environment in which rural transit might be a career of choice.</p> <p>It is assumed that healthcare and pension costs will be reflected in total operating costs per employee, which are outside of the total additional costs for direct investments in transit; these are presumed to be the cost of doing business and will be reflected in the budgets of individual transit operations. To plan ahead for these costs, however, MnDOT will incorporate these items in the final plan. Text has been added to the Executive Summary chapter 9 overview: “The financial outlook</p>



ID	Comment on Funding	MnDOT Response
	<p>other part of their budgets. Has the plan adequately accounted for rapidly rising health care costs?</p> <ul style="list-style-type: none"> • Cost for pensions – some systems are facing a growing pension liability. Was that accounted for in the transit investment plan? 	<p>considers more than just increases in operating costs. As service expands and inflation occurs, the costs of vehicles, facilities, and employee salaries and benefits must also be taken into account.” In practice, all reasonable proposals for cost increases on a system-by-system basis are evaluated by MnDOT.</p>
39	<p>3) The plan should convey the transit investment gap in the executive summary, not wait nearly 100 pages to do so. Even then, the description of the \$114-million investment gap is still rather vague. Does it include both operating and capital costs? Is a 7% increase over the current annual budget sufficient to meet the description of increased transit need? Oddly, the Investment Plan provides no background on past state funding trends or a recommendation for sources of additional state funding. Conversely, the Metropolitan Council describes a half-cent metro sales tax increase for transit expansion in their Transportation Policy Plan.</p>	<p>MnDOT has noted the comment about the need to add information about the investment gap to the Executive Summary and has made this adjustment. Clarification of operating versus capital funds has also been added. MnDOT will be working with MPTA to address additional cost requirements. MnDOT will endeavor to supplement the information provided in the Plan to illustrate the past state funding trends, however the Plan’s intent is not to recommend additional sources for state funding; the funding mechanisms for the Metropolitan Council region, where an additional sales tax could be assessed locally cannot be applied in Greater Minnesota.</p>
4	<p>Not sure if the responses given provide enough background/evidence too necessarily, support all of the conclusions, and consequently the development of the future directives. However, it does highlight potential needs based on future growth patterns in the years to come.</p>	<p>MnDOT appreciates the commenter’s careful review. This comment has been noted. The GMTIP is updated every five years and updates will include refinements to growth estimates to further support the plan’s outcomes. Additional text will be added to highlight the needs based on future growth patterns.</p>

Service Plan and Related Concepts

Greater Minnesota transit agencies and stakeholder submitted comments on the service plan chapter. Commenters listed concerns about the equity of elevating service in municipalities compared to rural areas. Transit systems also noted the challenge of expanding service in very rural areas and that the structure of the baseline span of service will be difficult for some systems to provide. In comparison, other stakeholder highlighted MnDOT’s strategies of increased transportation coordination around the state and support the regional travel strategies.

Based on the comments received, MnDOT decided to rewrite this chapter to accommodate some concerns and explain the service plan in more detail. The plan released in March 2017, for public comment includes the updated chapter.

ID	Comment on the Service Plan and Concepts	MnDOT Response
7	<p>This language suggests that the increased number of service hours needs to be spread throughout the state to cover 90% of the current service area. Yet the Greater Minnesota Transit Investment Plan focuses on the increase in the total number of service hours proposed without clearly addressing the need for a geographic distribution that meets this requirement of the Olmstead Plan.</p> <p>While language in the Greater Minnesota Transit Investment Plan highlights the benefits of increasing service in areas with a higher population density, we believe that areas with less density have a higher need for increased transit service due to</p>	<p>By distributing investment in transit throughout the State, the GMTIP highlights the benefits of increasing service in higher density communities, small urban areas and regional/rural areas. The different service delivery mechanisms discussed in the plan (deviated routes, regional mobility, etc.) all have different standards, which are achievable based on population and geographic factors.</p>



ID	Comment on the Service Plan and Concepts	MnDOT Response
	the lack of other options and the larger distances people need to move which makes trips more expensive.	
7	<p>In addition to the level of funding required to meet the goals in the Olmstead Plan, MPTA members have questions about the distribution of the funds and where transit service will be expanded. As stated in the letter to Judge Donovan Frank from Mary Tingerthal, Chair of the Olmstead Subcabinet, Transportation Goal Three says: “By December 31, 2020, expand transit coverage so that 90% of the public transportation service areas in Minnesota will meet minimum service guidelines for access. [*Baseline to be established by December 31, 2016.]” (bold added)</p> <p>Minnesota state planning goals in MS174.01 include: “Provide multimodal and intermodal transportation facilities and services to increase access for all persons and businesses and to ensure economic well-being and quality of life without undue burden placed on any community.” We would argue that all areas of the state need to benefit from increased access to transit service both in terms of hours of service and geographic reach of transit service.</p>	<p>The comment notes that all areas of the state need to benefit from increased access to transit service both in terms of hours of service and geographic reach of transit service. This plan reflects the importance of statewide investment, with investments applied to transit operations throughout the state.</p> <p>One of the challenges in Greater Minnesota is that some transit systems operate services that are inefficient: these operations may be unable to meet the performance standards if they continue to provide service using their existing service delivery methods. In order to meet the productivity targets described in the plan, transit agencies are encouraged to make changes to their service delivery approaches based on the standards, which were developed based on the review of existing performance of Greater Minnesota transit providers, this plan identifies achievable standards: 3 passengers per hour for a dial-a-ride and 3 boardings per trip for regional mobility services are an appropriate baseline for services.</p>
14	<p>Figure 6.7 - The Span of Service. The baseline for County Seat Town/Small Communities should be 5 days per week. Perhaps the baseline could be fewer hours per day, but I believe it is necessary to have the option for regular, consistent service every weekday for people to take advantage of public transit to go to work, school, and day care (and everything else that happens 5 days per week). You are overlooking a large number of customers if you do not establish the baseline for every day of the week.</p>	<p>MnDOT established this baseline metric of 3 days per week to balance the need for services with the fiscal reality of funding limitations and lower demand in small communities. MnDOT will be working closely with MPTA to address this issue.</p>
8	<p>I serve on the Western Community Action Advisory Transportation Committee and live in Jackson county. I was a part time bus driver with them for 5 years after I retired and now do volunteer drives.</p> <p>Looking at your suggestions, I find two things that could be of concern for a low populated county like ours. One the service hours seem overly rigid. Two, I don't see the political will to fund into the future by low density counties such as ours.</p>	<p>Service hour metrics are based upon community size and are meant as guidance for areas with populations under 2,500 people. These are for transit providers that are not serving county seats, providing flexibility for local decisions on exact hours of operation. Finding local match is indeed a challenge addressed in strategy 4.1. MnDOT is working with transit providers and elected officials across to the state to promote an understanding of the value of investment in transit.</p>
11	<p>Greater Minnesota mobility is key to helping rural populations, especially communities living a distance from goods and services.</p>	<p>MnDOT appreciates the effort taken to review the plan and submit a comment. This input is important to the process, and the focus of the plan reflects this comment.</p>
27	<p>We welcome the push to improve coordination of services. In particular, we encourage the Department to focus on improving travel between counties.</p>	<p>MnDOT appreciates the commenter’s careful review and has noted the comment about improving travel between counties and is highlighted in strategy 1.5. MnDOT appreciates recognition of the role of the RTCC in coordinating services, emphasized in Goal 2.</p>



ID	Comment on the Service Plan and Concepts	MnDOT Response
7	Cost for IT improvements – MPTA members report that a small percentage of their current budget is being used for software and IT improvements. With additional service, the need for more technology will increase. Where will funding come from to address this need?	MnDOT includes money for technology in the annual application for transit systems. MnDOT will continue to contribute the 80 or 85% depending on the transit agency.
39	1) The plan provides virtually no guidance on how MnDOT intends to meet Minnesota's statutory transportation goal to increase use of transit as a percentage of all trips statewide by giving highest priority to the transportation modes with the greatest people-moving capacity and lowest long-term economic and environmental costs. Priority for transit modes could be reflected by more boldly highlighting a strategy to meet funding needs and by a more complete definition of transit needs, but the plan lacks both of these elements. In fact, the plan explicitly states that the ridership estimation model used is not intended to serve as a planning tool for designing future transit services that could influence travel choices.	The intent of this plan is to provide an investment and strategic plan. As an investment plan, this document identifies the investments needed to reach the target of meeting 90 percent of transit demand by 2025. As a strategic plan, this document lays out the policy direction for transit in Greater Minnesota over the next 20 years, and acknowledges that limited solutions exist for providing the greatest people-moving capacity in rural areas. The comment is correct that the estimation model is not intended to serve as a planning tool for designing future transit services. It was used to estimate demand to determine cost projections and provide a basis for service planning. Services are designed at the local level by transit providers and policymakers with technical support from MnDOT. MnDOT does not assess mode split data at the state level.
15	Do the goals in this plan differentiate between need and demand, or are they the same for the purpose of this document?	Need for transportation is defined as a desire for a means to get around, whereas demand for public transit is defined as the subset of the population who might actually use public transportation to meet their transportation need. Need always exceeds demand, since some people will choose to meet their need by getting a ride from a family member or friend, for example.
37	The other concern, which we have brought up during other meetings, is the hiring of qualified drivers and the shortage thereof. We want to add the extra hours, which is great, but the current drivers we have in system are at their max service hours. This would mean a complete change to our operation of our systems with hiring a lot more drivers, which are extremely hard to find out here. We can entice them with fulltime and additional hours and benefits however I am not sure all of those cost are figured into this plan because it is a huge unknown.	A shortage of available, qualified drivers in rural areas was noted by a number of stakeholders early in the plan development process, and MnDOT acknowledges this issue, particularly as compared to Metropolitan Area drivers who have generally higher wages and benefits. MnDOT has funded wage and benefit restructuring for several rural systems and will continue to monitor this issue. It is in the interests of Minnesota communities to foster an employment environment in which rural transit might be a career of choice. <u>No additions have been made to the plan for this issue.</u>
37	The only other thing that may need to be taken into consideration is the additional storage needs for the additional buses that could be needed to provide the additional hours.	MnDOT acknowledges that in some communities, additional capital investment will be required to build facilities to store expansion vehicles.
39	The plan's definition of transit need is confusing and grossly underestimates needs statewide. MnDOT should take steps to correct this with a focus on the following: <ul style="list-style-type: none"> • a. The plan calculates transit need based solely on transit trips that would serve people who are currently transit dependent. This is a good place to start, but fails to consider the many people in Greater Minnesota who drive today but who would 	The first strategic goal in the plan, Goal 1, is to make transit service an attractive and viable transportation option for Greater Minnesota, with strategies that address the issues raised in the comment, including improvements to the span of service, frequency of routes, regional connectivity, better public information, and customer amenities. Goal 3 advances investment to meet the need of an array of



ID	Comment on the Service Plan and Concepts	MnDOT Response
	<p>benefit from having transit options. How will MnDOT meet the needs of Greater Minnesota's aging population? Alternatively, of Greater Minnesota families who are struggling to afford the costs of car ownership and operation? Unfortunately, the plan does not answer these questions. The plan states that, Transit riders and non-riders responded that service needs to be reliable, convenient, frequent, and connected, in infrastructure and communications and extensive community input called for transit to be available when and where it's needed. Nonetheless, MnDOT provides virtually no direction on how to attract new riders who would choose transit if more service was available in their communities.</p> <ul style="list-style-type: none"> • b. The plan calculates some transit trip needs that will remain unmet by the proposed level of increased transit service. MnDOT inaccurately assumes that every additional transit trip will align one-to-one with the origin-to-destination needs of transit-dependent riders. Without a transit accessibility measure, we only know that there will be more transit service, but not, for example, that it gets a job seeker when or where she needs to go. 	<p>markets across Minnesota, including riders who currently drive but could opt for transit if the services are designed to meet demand.</p> <p>The Plan makes no assumption that every additional transit trip will align one-to-one with the origin-to-destination needs of transit-dependent riders. Transit service planning efforts at the local/regional level are conducted to identify travel demand at the local/regional level. While this Plan provides guidance for the types of service delivery that can be employed to meet demand, the specific implementation approach is to be determined at the local level based on local priorities, with technical assistance from MnDOT. MnDOT has conducted regional travel and mobility studies in different parts of the state that have quantified the demand for riders and non-riders alike.</p>
30	<p>I was very impressed with the plan and the way it is put together. I wonder why age was not looked at closer as related to transit ridership. I think it would be interesting to see the age group vs amount of ridership on transit in greater MN and the same comparison done for the metro ridership.</p>	<p>MnDOT gathered this information using an onboard traveler survey that was distributed to riders during one week in November 2015. Over 5,500 responses were collected and showed that 18% of current riders who answered the survey are 65 years of age or older. This is graphically shown on page 40 of the Plan.</p>



Transit Coordination Strategies: Regional Transportation

Coordination Councils

One of the major strategies of the GMTIP to increase access to transit is to improve coordination among providers. The Regional Transportation Coordination Councils (RTCC) are an important component to improving transit service. MnDOT received several comments regarding the RTCCs. Generally, comments are supportive of the initiative and other coordination efforts. No changes were made to the plan based on these comments.

ID	Comment on RTCCs	MnDOT Response
27	<p>People with disabilities, themselves, can be a major resource in the effort to coordinate services. Increasing the representation of people with disabilities on Regional Transportation Coordinating Councils will allow transportation planning to benefit from our community's perspective on current service delivery and coordination. As people age in place and Minnesotans with disabilities begin to enjoy more integrated living and employment opportunities, all stakeholders need to be engaged in transportation planning. There must be greater coordination between Regional Transportation Coordinating Councils, the Minnesota Council on Transit Access and social service providers. For example, 5310 funding should not simply be used for DT&H transportation, but should be expanded to connect people with disabilities to their whole community.</p>	<p>MnDOT is pleased to be one of the partner organizations participating in the RTCCs and has found that solutions can often be identified through greater collaboration.</p>
11	<p>One objective to improve transportation needs is for Regional Transportation Coordinating Councils to coordinate with social service agencies to develop transportation options for health and human service clients. This will help improve access to healthcare and other services for underserved populations. The vision is to connect people to jobs, goods, services and recreation - all-important to ensuring health equity for all people.</p>	<p>MnDOT has noted this comment. MnDOT is pleased to participate on the RTCCs and recognizes that health care transportation must be a critical part of the RTCC role.</p>
5	<p>Overall, a good plan. Improving reliability in rural areas is a very good goal. However, access to transit, especially in rural areas, is important for person wanting to keep in their homes. Some efficiency may be lost at the expense of providing access. RTCCs are a good idea.</p>	<p>MnDOT appreciates the commenter's careful review and recognition of the value of the RTCCs. One of MnDOT's core values is to allow people to age in their home.</p>



Olmstead Plan

The GMTIP was developed in the same period as the Olmstead Plan. Although the strategies, service plan and performance measures support the goals of the Olmstead Plan, the two plans are separate and not directly tied to each other. Comments received about the Olmstead Plan and the GMTIP were addressed below. No changes to the GMTIP were made based on these comments.

ID	Public Comment on the Olmstead Plan	MnDOT Response
7	<p>We see a discrepancy between the focus of the Greater Minnesota Transit Investment Plan on achieving a target of 17 million rides (90 percent of estimated need) by 2025 and the goal in the Olmstead Plan of achieving 18.8 million rides in Greater Minnesota by December 31, 2025. We believe that the level of increased service needed to meet the requirements of the Olmstead Plan will require a higher funding level over the next few years, requiring additional funding prior to 2021.</p>	<p>The Olmstead Plan is being amended to reflect the 17 million rides target. The Olmstead Plan was published in advance of the GMTIP development and the 18.8 million trip target was based off the old modeling approach.</p>
7	<p>To the extent that additional service is being provided to serve people with disabilities and meet the requirements of the Olmstead Plan, MPTA believes that no local match should be required for that additional service. State mandated transit service should be paid for by growing state and federal funds while the farebox and local funds continue to support existing service, which is increasing in cost each year due to inflation and other cost pressures.</p>	<p>The proposed additional services in the GMTIP are a reflection of the legislative goals and anticipated revenues. The service is not mandated by the Olmstead Plan, but the goals of the GMTIP are included in the Olmstead Plan goals. Since the service expansion is within the constraints of the anticipated revenue and timeframe of the GMTIP investment in expanded service is anticipated to follow existing local share requirements.</p>
7	<p>While the Greater Minnesota Transit Investment Plan mentions the Olmstead Plan in passing, it does not go far enough in making it a planning priority. With Minnesotans with disabilities no longer confined to institutional settings, it becomes even more imperative to ensure that every neighborhood, in every community around the state properly meets the needs of limited-mobility Minnesotans. Those goals mandated by the United States Supreme Court will only be realized with a robust, accessible transportation system. Therefore, any long range transportation planning must anticipate the effect of this imperative to increase mobility for Minnesotans with disabilities, living in integrated settings.</p>	<p>The RTCCs offer an approach to develop a seamless system of transportation services throughout the state. MnDOT is one of several partners (working with the Department of Human Services and others) through the RTCC structure.</p>



Benefits of Transit

MnDOT received several public comments related to the wider benefits of transit, specifically the health and economic benefits. These remarks are generally supportive of the GMTIP language, some additional information on the economic benefits; both local and national data was added to Chapter 2: Wide Benefits of Transit.

ID	Comments on the Benefits of Transit	MnDOT Response
11	Promoting transit use can encourage walking and biking because each trip typically starts and ends with a walk or bike ride. One study reported that transit users walk to and from the transit station for an average of 19 minutes per day, and another reported 29% of transit users walk at least 30 minutes per day (Besser & Dannenberg, 2005). Another study reported that people who use public transit walk an additional 21 minutes a day in going to and from transit stops or stations (Freeland, Banerjee, Dannenberg, & Wendel, 2013).	MnDOT has noted this comment. Based on this and other input from the commenter, MnDOT has made some adjustments to the plan to acknowledge the role of transit – in association with investments in pedestrian and bicycle infrastructure – in supporting health equity.
11	Active transportation can be a significant source of regular physical activity when incorporated into daily routines and can contribute to meeting the national physical activity guidelines of at least 150 minutes per week (Buehler, Pucher, Merom, & Bauman, 2011; Lachapelle, 2011). More people meeting the physical activity guidelines will result in reduced obesity and related chronic diseases such as diabetes, heart disease and stroke, and some cancers.	MnDOT has noted this comment. Walking to and from bus stops does help to meet daily activity goals. MnDOT has made some adjustments to the plan to acknowledge the role of transit – in association with investments in pedestrian and bicycle infrastructure – in supporting health equity.
11	The health benefits of physical activity have been well documented by hundreds of studies. An increasing number of recent studies have confirmed that these benefits are specifically linked to walking and biking (Kelly, 2014; Oja et al., 2011; Saunders, Green, Petticrew, Steinbach, & Roberts, 2013). For example, it has been reported that people who bike or walk at an amount meeting the national physical activity guidelines of 150 minutes/week, the risk of death for all causes is decreased by about 10 percent (Kelly, 2014; Woodcock, Franco, Orsini, & Roberts, 2011). For risk of heart disease, one study found the risk is reduced by 16 percent for people who walk three hours per week (Hamer & Chida, 2008b) and another study found the risk is reduced by 11 percent for people who actively commute compared to people who do not actively commute (Hamer & Chida, 2008a).	MnDOT appreciates the various references provided by the commenter in support of the benefits of physical activity. MnDOT has made some adjustments to the plan to highlight the facts provided by the commenter in support of the health benefits that are derived from or associated with investment in transit.
11	Benefits listed under the Health section include increased physical activities and reduction of obesity and chronic disease. While true, these are just part of what it means to achieve health equity. However, the overall vision of this document encompasses many other components of what creates health equity.	MnDOT has noted this comment. Public transportation, as noted, is one component of a healthy lifestyle. Based on this and other input from the commenter, MnDOT has made some adjustments to the plan to acknowledge the role of transit – in association with investments in pedestrian and bicycle infrastructure – in supporting health equity.
7	One area that is not well defined is the economic return of transit investments. We know from national data and data from the Metropolitan Council that transit investments pay for themselves with a positive return on investment. We believe that this benefit should be explained and highlighted more in the GM Transit Investment Plan	MnDOT appreciates the reviewer’s comments regarding the economic benefits of transit. MnDOT has added additional language to Chapter 2: Wide Benefits of Transit.



Strategies and Related Comments

Stakeholders and citizens submitted several comments related to the strategies in the GMTIP. Comments are generally positive, some asking MnDOT to consider new technologies and approaches to transit in the future. All comments were addressed in the plan; no changes were made based on these comments.

ID	Comments on Strategies	MnDOT Response
27	We also encourage the Department to be mindful and proactive about preparing for the spread of driverless cars, as this technology is beginning to evolve and holds great potential for increasing the mobility of Minnesotans with disabilities.	MnDOT has noted this comment about driverless cars and intends to work on this issue in the future.
16	Your plan assumes that no new ideas in transit are possible. This is not so. Check out www.advancedtransit.org . The new ideas will markedly improve service, reduce costs and save energy.	MnDOT updates this plan every five years to ensure that strategies reflect current trends and advances in technology. For example, in this plan, Transportation Network Companies (TNCs) are incorporated in under Strategy Code 3.2.
39	The plan lacks prioritization and accountability for the 29 strategies that MnDOT will use to advance its six stated transit goals.	The plan intentionally allows local transit providers and policymakers to prioritize how the 29 strategies will be employed and how local funding can be generated, and MnDOT to make those determinations based on the characteristics of the service/study area selected. In implementing this plan, MnDOT will develop approaches to ensure accountability.
27	The Statewide Multimodal Transit Plan rightly identifies the demographic trend of an aging population and a correlative rise in the rate of disability in Minnesota, but fails to connect this to ensoncing accessibility as a core design principle.	MnDOT acknowledges this comment. MnDOT's ADA Transition Plan and Complete Streets Initiative have move accessibility to a core design principal. The Complete Streets Initiative is referenced in the strategies under Goal 5.
10	The so called system ignores a component of mass transit that pays all government costs associated with maintaining it and in fact is profit center benefiting local communities: taxis. Why not incorporate taxis as interconnections to and from other sources of mass transit. And, include taxis in all advertisements for mass transit?	Increasing use of taxis and TNCs are noted in Investment Strategy 3.2. Coordination with taxi providers is covered under the Investment Strategy 2.2, as taxis are often a key piece of the non-emergency medical transportation provider network.
6	I encourage you to consider the needs of tourists, tourism development, and the opportunity to expand the use of local transit services by tourists to leverage additional value from these investments from ecological, economic, and visitor-friendly benefits. Please see the recent Minnesota Great River Road corridor management plan http://www.mnmississippiriver.com/cmp/media/resources/pdf/2016%20GRR%20CMP%20REPORT.pdf for examples of how transit can complement the byway and now with the Mississippi River Trail, bikeway and experience. Use the Find function and type in transit to help sift through the report.	MnDOT has noted this comment and added the addition of tourism and recreation markets to Strategy 3.1.
3	We need some kind of regular city-to-city bus service outside the metro area (greater Minnesota) that is affordable.	Intercity bus service is covered under Investment Strategy 1.5, and MnDOT recognizes the importance of transportation beyond community boundaries. This is noted for future planning efforts when MnDOT updates the Intercity Plan.
41	Local governments want to support and manage local transit service. Many elected officials as well as community leaders	Greater Minnesota's transit providers emphasized the importance of local decision making in the development



ID	Comments on Strategies	MnDOT Response
	<p>understand the value of transit in improving the quality of life and economic development of their communities. They also want to be involved in managing service that they are contributing to financially. Plans to take control of transit operations out of the hands of local system managers erodes the interest and commitment to transit service on the part of local officials. MPTA members have strong concerns about any effort to take scheduling and new routing decisions out of the hands of local transit system managers. Local Advisory Committees have provided a critical local voice in helping systems determine the most cost-effective and efficient ways to improve and expand local transit service.</p>	<p>of this plan and MnDOT works very closely with local providers and jurisdictions across the State. MnDOT regularly provides technical assistance to address the requests of local policymakers who seek to make their transit services more efficient and effective. The GMTIP does not advocate for or demonstrate any intention or provision to move local transit decision-making responsibilities out of the hands of local officials.</p>
42	<p>I do work for Stearns County, but I am writing this as a Minnesota citizen. I attended one of the public meetings on 8/29/16 in St. Cloud. Thank you, it was well organized and helpful to see the proposed changes. Looking at a baseline span of service made sense to me and your thresholds seem like a reasonable place to start. The Investment Scenarios seem logical as well - even though nobody wants to talk about contraction times. I think it is great that you have an eye on focusing services to assist with the Olmsted Plan work that needs to be accomplished. I feel it would be beneficial if there was more interaction between state agencies to coordinate all the transportation needs for clients especially in DHS, DEED, and MDH. A person in our meeting brought up using stories to for the investment goal of Elevating public information and outreach. I think that the MDH SHIP (statewide health improvement program) team could be so helpful in this area. MDH needs transportation expertise to assist with some SHIP strategy implementation and you need communication expertise - perhaps there could be some type of swapping of expertise. Thank you for the opportunity to comment.</p>	<p>Thank you for your careful review and comment. MnDOT agrees that the baseline span of service is an appropriate place to start adding transit service. MnDOT also agrees that coordination between state agencies is especially important and will highlight the collaboration in the plan.</p>



Other Modal Comments:

MnDOT received comments from the public and stakeholders related to light rail, commuter rail, intercity-train, freight, highway infrastructure, bicycles and pedestrians. Some comments reflected the need to increase connections between modes or provided insight on challenges on “first mile/last mile,” other comments were not relevant to this plan and have been distributed to other MnDOT modal offices. No changes were made based on these comments except for additional language supporting bicycles and pedestrian infrastructure in the strategies section of the plan.

Mode	ID	Comment on Other Modal Options	MnDOT Response
Light Rail	12	As a native Minnesotan who recently came home, one thing I really miss from my former metropolitan life is public transportation, specifically a light-rail system. Light-rail systems are simply awesome and Northern Minnesota has been isolated for far too long. There has been some discussion about the North Star Line and I wish to express my enthusiasm and support for something that I believe will transform Northern Minnesota, Duluth and the entire rail line. I have seen first-hand how rail lines invigorate communities, create job growth and most importantly; improve the lives of the people that use these public gifts. While the cost is initially steep, the long-term pay-off would be tremendous in revenues from: tourism money, anticipated development and growth along the line. Minnesota would be leading the country in progressive, sensible infrastructure instead of reactive fix-and-patch measures. Please consider again going forward with the North Star Line; it will surely outlast me in my lifetime and would be a treasure for the many generations of future Minnesotans. Thank you for your time.	This comment has been forwarded to MnDOT's Rail Planning and Development team.
Light Rail	12	Cutting up our parks with light rail is a terrible process. Get out of the commons.	This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service, and not within the Metro area. MnDOT has forwarded this comment to the Metropolitan Council.
Light Rail	12	Stop all light rail and streetcar crap. You have electric buses, use them to the hilt	This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service, and not within the Metro area. MnDOT has forwarded this comment to the Metropolitan Council.
Light Rail	35	Please do not spend any State funds on the rail service to Duluth. It's a boondoggle that will never achieve rider capacity that would warrant such an expenditure. The State would be better served by completing the	This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service, MnDOT



Mode	ID	Comment on Other Modal Options	MnDOT Response
		light rail to the western suburbs. I am a Duluth resident that knows the infrastructure of the planned route Duluth will not allow enough speed to make this desirable to the passengers. I don't care if there is a lot of Federal money, it will still be a waste.	has forwarded this to our Passenger Rail Office.
Light Rail	1	Under community input, in a few public settings, I did present the notion of identifying an "Express Run" vs. a "local stop" service within the same corridor. COMMENT: offers to riders to take quicker transit trains vs, slower stop at each station trains.	Express and local service patterns increase service speed and reliability for certain passengers. The decision to diversify the types of services offered is not a major focus of this investment plan.
Light Rail	1	Paragraph Section #4 – Expand the on time performance discussion by inserting language to set a standard station time for how long trains stop at each station. Times should include loading and offloading passengers safely. Reason, is the need to ensure that corridor transit times from end-to-end of lines are maintained.	This Investment Plan's focus is on small urban and rural bus services. This rail performance comment has been forwarded to MnDOT's Rail Planning and Development team.
Light Rail	1	Figure 8-1, Metrics, Strategy Code – ADD Section 1.9 - Establish a standardize station stop times using the "+" symbol to indicate supports measurement standards; or ADD as Section 5.5	This Investment Plan's focus is on small urban and rural bus services. This rail standards comment has been forwarded to MnDOT's Rail Planning and Development team.
Light Rail	1	ADD an objective "Reliability: Improve station train stop times; "Metric" Identify standards to offload/load passengers safely off/onto trains.	This Investment Plan's focus is on small urban and rural bus services. This comment about rail service standards has been forwarded to MnDOT's Rail Planning and Development team.
Light Rail	18	I was most disappointed that I/WE were not even afford the opportunity to request Light Rail/METRO options. Why in 2015 are we talking about buses alone and not METRO and Buses? Having some bus services throughout Greater MN Rural connecting to METRO service line to/from Mankato? Rochester? Duluth? Hutchinson? St Cloud and to/from the Twin Cities with stops along the lines? Just seems like this some we should tackle now.	Transit service connecting into larger cities is included in the Plan under regional express services. The scope of this plan addresses bus service only in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service. MnDOT has forwarded comment this to our Passenger Rail Office.
Commuter Rail	32	There is a dire need to improve the traffic flow along the highway 10 corridor from Little Falls to the Twin Cities. There seems to be a continuous flow of vehicular traffic that is beyond the ability of the highway to handle. Due to the lack of public transportation in the rural areas of MN people are forced to commute by car. One possible solution would be to extend the Northstar Commuter rail service from Big Lake to Little Falls, with additional stations in Clear Lake, St. Cloud, & Rice. This probably won't do much for the	This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service, MnDOT has forwarded this to our Passenger Rail Office.



Mode	ID	Comment on Other Modal Options	MnDOT Response
		weekend or truck traffic but it will surely help those who commute daily to the Twin City Metro Area.	
Intercity- Train	17	<p>Minnesotans desperately need better intercity train service. A second daily train to Chicago is a MUST, utilizing a more convenient arrival/ departure time than the current Amtrak Empire Builder. There is HUGE travel demand between our two major upper Midwest cities! Daytime service on the E.B. route Twin Cities to Fargo is also needed badly...give people an attractive travel option to avoid congested, dangerous I-94...please! Trains bring economic growth and vitality to all online communities, as has been proven many times over in other states.</p>	<p>This comment is noted, The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service. MnDOT has forwarded this to our Passenger Rail Office.</p>
Freight	28	<p>The Minnesota Department of Agriculture (MDA) appreciates the opportunity to review the draft Statewide Multimodal Transportation Plan, 20-Year Minnesota State Highway Investment Plan, and Greater Minnesota Transit Investment Plan. The MDA supports the plans for the reason that they strive to maximize the health of people, the environment, and the economy. The MDA also has an interest in the Freight Critical Connections investment area and how funds will be directed toward public and private freight facilities-rail, water and intermodal facilities. It is our understanding that Minnesota will receive approximately \$10 million a year for this program, as a result of the new federal surface transportation bill, Fixing America's Surface Transportation (FAST) Act. The MDA is already involved in statewide transportation issues through Executive Order 16-06, creating the Governor's Council on Freight Rail, that was established to elevate coordination and partnership between the state and railroads; to actively promote safety and reduce risks; and to ensure efficient movement of goods to support our economy while minimizing the impacts of those operations to our local communities. As freight plans are fully developed, we request inclusion on plans that affect agriculture. Again, thank you for the opportunity to comment and please let me know if you have any questions.</p>	<p>MnDOT has noted this comment and appreciates the time taken to review the plan and provide comments. As noted by the commenter, these issues are primarily addressed by freight investment plans. MnDOT looks forward to collaborating with MDA to ensure the Department's priorities are addressed in MnDOT's planning efforts. These comments have been forwarded to the Office of Rail Planning and Development.</p>
Bicycles	15	<p>Policies regarding bikes on buses (either racks in front, or allowing people to carry their bikes onto the bus?)</p>	<p>MnDOT encourages agencies to purchase vehicles that accommodate bikes on buses.</p>



Mode	ID	Comment on Other Modal Options	MnDOT Response
Pedestrians/Bicycles	34	Transportation options are vital to my vision of a future without total focus on automobiles. We will want to be mobile for work and play without the burden of strangulation our cars can cause.	MnDOT acknowledges that successful transportation networks are multimodal: investments in pedestrian and bicycle infrastructure can support investment in transit and vice versa.
Pedestrians	15	More specificity in overlap between Minnesota Walks and the Transit Investment Plan.	The plan appendices include in-depth discussion of the plans reviewed that are relevant to the GMTIP. MnDOT acknowledges that transit riders are mostly pedestrians and those investments for pedestrians benefit access to transit. Strategies from the Bicycle System Plan and Minnesota Walks have been added to the Strategies in Chapter 7.
Pedestrians	15	Prioritize the pedestrian - provide pedestrian and bicycle connections to transit stops. Also, consider existing pedestrian and bicycle infrastructure in system planning.	MnDOT has noted this concern. MnDOT acknowledges that transit riders are mostly pedestrians and those investments for pedestrians benefit access to transit. The GMTIP included bicycle and pedestrian amenities in the development of the plan and are included in the Appendix of Provider Standards. The plan also references Minnesota Walks and the Bicycle System Plan in the Strategies under Goal 5.
Pedestrians	7	The GM Transit Investment plan calls for a greater investment in the first mile/last mile connection through bicycle and pedestrian improvements. Will this investment be made with transit dollars or will the Department advocate for additional general fund dollars to address this cost?	MnDOT will explore this further in working with MPTA.
Pedestrians	27	For the disability community, this must include a focus on accessibility. In particular, timely and thorough snow removal at transit stops is required if Minnesotans with disabilities of all ages are to have access to transit services.	MnDOT acknowledges snow removal is an important local issue. It is the responsibility of the transit agency to clear snow at transit stops and neighboring sidewalks. It is a local responsibility to clear sidewalk snow according to local ordinances. This comment has been forwarded to the appropriate Office for implementation. No action taken in this Plan.
Pedestrians	27	MSCOD hopes it will tighten the timeline of the ADA Transition Plan.	Your comment has been noted. The 20-year timeline is based on providing accessibility improvements with road projects meeting the accessibility threshold; these include curb ramps, pedestrian signals, and sidewalks. MnDOT is making improvements on ADA facilities as appropriate and according to the ADA transition plan. This comment has been forwarded to



Mode	ID	Comment on Other Modal Options	MnDOT Response
			the Accessibility Office for implementation. No action taken in this Plan.
Highway infrastructure	1	Under “Next 20 years” – long-range transit plans – incorporate - strategy to move passengers and freight off roads & bridges onto railroads, employing the “hub & spoke” principals. GOAL to reduce high spending on upgrading highway infrastructure every 5-10 years	This Investment Plan’s focus is on small urban and rural bus services. This comment about prioritizing rail service has been forwarded to MnDOT’s Rail Planning and Development team.
Highway infrastructure	11	Climate change impacts will increase the total costs to the nation’s transportation systems and their users, but these impacts can be reduced through rerouting, mode change, and a wide range of adaptive actions. Key Message #4 in Chapter 5. Transportation of the 3rd National Climate Assessment, 2014. Mode change would include shifting more single-occupancy vehicle mode users to the transit mode.	MnDOT has noted this comment. Transit can help curb the effects of climate change and this is a key emphasis in Chapter 2, supporting the value of investment in transit.

Comments related to the Metropolitan Area or Twin Cities Area:

MnDOT received several comments related to transportation in the Twin Cities Metropolitan Area. Although appreciated, these comments are outside the scope of the Plan. These comments have been transferred to the appropriate offices to address. No changes to the plan were made based on these comments.

ID	Comment on the Metro Area	MnDOT Response
19	I am 58 and hope to continue driving (work at 3M) for at least 6 years to get to work and later only to visit places hard to reach by bus. Public buses at every corner frequently would encourage my usage. Please get the bicycles off the roads, or at the very least DO NOT close driving lanes during rush hour for bicycles, (I rarely see bikes on them anyway). Thank you.	This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service, and not within the Metro area. MnDOT has forwarded this comment to the Metropolitan Council.
19	Public transportation is an important reason that many of us live downtown- including aging and handicap. I have lived in places with great train/subway systems and love it BUT in MN it is not a cost effective choice, no ROI. Rather, I suggest increasing/improving what we have-perhaps electric buses and many more of them so that we can get to a stop. Second, it has been exceedingly frustrating that you have taken over complete traffic lanes downtown for bicycles. 9th St is a total waste-1 bike per month. And we have traffic jams. Get Bikes OFF THE ROADS- it's unsafe for all. Bikes should have lanes within sidewalks. Roads are for motorized vehicles! Also, the buses sit blocking an entire lane 1 of only 2, on (4th or 5th ave?) where traffic backs up to turn left on to highway or right to go behind Civic Center. At a minimum bikes and parked buses should not be allowed on downtown streets during rush hour. Thank you for asking.	This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service, and not within the Metro area. MnDOT has forwarded this comment to the Metropolitan Council.



ID	Comment on the Metro Area	MnDOT Response
40	<p>As a well-known transportation journalist, and life-long Minnesotan, I believe my views on Minnesota transit investment are valid. First, the NLX (which is NOT HIGH-SPEED RAIL) only conventional, and the proposed rail issues concerning TC to Rochester should be scrapped! Bus Rapid Transit is a more practical application of public transit for these urban connections. Public rail passenger transit in Minnesota is nothing more than tax supported socialized transportation. I personally use one of our better suburban bus lines (MVTA) many times during a week and find it well operated. MVTA would be a good model for Duluth-TC-Rochester bus rapid transit. Utilizing existing roads and infrastructure (BRT) would be a better return on investment.</p>	<p>This comment is noted. The scope of this plan addresses transit in Greater Minnesota, mostly through rural deviated routes and dial-a-ride service. MnDOT has forwarded this to our Passenger Rail Office and the Metropolitan Council.</p>
33	<p>I travel from Rochester to Bemidji often. I want a non-congested route around the cities ... and a quick 4-lane path from 94 south of St Cloud to hwy 10. Both of these issues have existed for 50 years and there has been no attempt to resolve either of them. The money to address these issues and many more is available if the light rail projects were stopped. If you're looking to invest in public transit, you should be doing it with buses.</p>	<p>MnDOT appreciates the effort taken to review the plan and submit a comment. This input is important to the process. This project is currently under construction and this comment has been forwarded to MnDOT District 3 planning and engineering staff.</p>
20	<p>We really need transportation in the western suburbs. The rail line to Eden Prairie with all the businesses there is needed. The only public transit to Eden Prairie, Chanhassen, even to Waconia is Metro Mobility or Metro Transit small busses. I so hoped the governor would get to use the federal funds for that project!</p>	<p>This comment is noted. The scope of this plan addresses transit in Greater Minnesota, not the Metro area. MnDOT has forwarded this comment to the Metropolitan Council.</p>
42	<p>While I see a need for this in Greater Minnesota, the Funding thru what the State & MnDOT is providing is inadequate and when compared to the investments in the Metro should bring outrage among the Citizens. From this quote PERFORMANCE MEASUREMENT, "MnDOT uses performance measures and targets to guide its plans, projects and investments. The GMTIP includes four performance measures (1) ridership, (2) fleet condition, (3) span of service and (4) on-time performance. MnDOT will report progress towards achieving the targets for each measure annually." I can assume you are not following your own plan and ideas when it comes to LRT plans & Routes. To have a completely Non-sustaining Route such as the SWLRT at the \$2-Billion Cost Estimate says BOONDOGGLE when each passenger will be subsidized to the tune of \$10 or more per ride, thus taking our scarce TAX DOLLARS away from many other more worthy projects. We in the SW Metro have a great Bus Transit System that changes routes according to travel demand, whereas the SWLRT will be the Largest RED WHOLE on the whole of Minnesota Transportation Funding. IF built, this will destroy a great Transit System in the S.W. Metro which has been a goal of the Met Council due to the Southwest Transit Systems awesome Success! They (The Met Council) in my opinion has tried to take over our System and due to be refused and challenged is pushing the Boondoggle of the SWLRT. Currently the runaround to</p>	<p>This comment is noted. The scope of this plan addresses transit in Greater Minnesota, not the Metro Area. Please see the Met Council 2020 Transportation Policy Plan 2040, Appendix G regarding standards that apply in the Metro Area. This comment has been forwarded to the Met Council.</p> <p>The example of the commenter's mother is a good representation of the clientele MnDOT seeks to better serve through the implementation of this plan. The Plan identifies the importance of investment in marketing for Greater Minnesota transit systems. This is covered under the strategy category "Improve Public Information."</p>



ID	Comment on the Metro Area	MnDOT Response
	<p>fund the SWLRT and saddle the Taxpayers with millions in debt should be illegal. Each of the Met Council Members should be held personally accountable for this debt. Back to the plan for greater Minnesota, I know from experience that many of these small local systems are not well promoted within their communities. If they were promoted properly within each community, they would likely see the ridership/use increase by 50% or more, thus helping them become less reliant on subsidies. My 88-year-old mother only heard about the system in her area last Winter. Although she is well fit for driving and very attentive, she has used the system a few times at my encouragement. She lives alone in her own home and only drives in town. I would suggest a newly energized promotional plan to make this asset known to the Seniors and other residents, thus increasing the ridership. Take the money proposed for just the Subsidies on the SWLRT and send that to the Greater Minnesota Transit Systems and save to \$2-Billion Construction cost and invest in special bus lanes and still have a billion or more left over.</p>	

Document Changes

- Double checking for plain language
- Clarifying language that describes transit need and the target of meeting 90% of transit need
- Defining commonly used terms, i.e. service hour, revenue hours
- Adding call-out boxes for critical details
- Clarifying funding language and descriptions
- Re-structuring the Executive Summary to follow the Plan's chapters
- Updating graphics and maps based on comments



APPENDIX

COMMENTER ID

ID	Name
1	Andru Peters
2	Barb Thoman
3	Beverly J. Anderson
4	Bob Apitz, Brown County Public Transit
5	Bob Bollenbeck (Regional Development Commission)
6	Carol Zoff, MnDOT
7	Craig Rempp (Minnesota Public Transit Association)
8	Dale Cuperus
9	Darrell Washington
10	David Dermer
11	Edward P. Ehlinger, Minnesota Department of Health
12	Unknown, Eveleth, MN
13	Federal Housing Administration
14	Gary Ludwig (Trailblazer Transit)
15	Hennepin County
16	J. Edward Anderson (Advanced Transit Association)
17	Jack Barbier
18	James Rosenthal
19	Jillian Wilkins, Loring Park, Minneapolis
20	Julie Wittman
21	Ken Lyons
22	Kim Pettman
23	Ronda Allis, MnDOT District 7
24	Marisol R. Simon
25	Matt Johnson (RDC)
26	Maxwell Kaufman (Southwest Regional Development Commission)
27	Minnesota Consortium for Citizens with Disabilities
28	Minnesota Department of Agriculture
29	Joan Wilshire, Minnesota State Council on Disability
30	Nick Anderson (Big Stone County Hwy Dept.)
31	LuAnn Bleiler, Paul Bunyan Transit
32	Paul Dierkhising: (Coldspring Building Materials)
33	Peter Huffman
34	Ralph O Hall (Key City bike club)
35	Ron Karlen
36	Sheryl Grassie
37	Ted Nelson, Prairie Five Transit
38	Ted Stamp (Southwestern Center for Independent Living)
39	Transit for Livable Communities (Form Letter)
40	William Hume
41	Federal Transit Administration
42	Peggy Sammons