

## Appendix G: Public Comment Period—Response to Comments

### G.1 Public Comment Period—Response to Comments—Introduction

The following Appendix summarizes the comments received on the Draft Long Range Transportation Plan and provides the APO response. The Plan was released for the purposes of public comment on Tuesday, August 5, 2014 and closed for comments on Friday, September 5, 2014.

As part of the open comment period the APO additionally hosted a public meeting for the document as part of the APO Executive Board meeting on Thursday, August 28, 2014. No one testified at this meeting.

In total the APO received three (3) comments. Two email submissions from individuals and a submission from MnDOT. Please see Appendix E for the full comments.

The appendix will identify who commented, summarize the comments, and provide a response. For greater simplicity the individual comments will be reviewed first and only a general response will be provided. Because of the number and specificity of MnDOT's comments each was broken into each individual item and responded to directly.

### G.2 Comments from Individuals

The following is a review and response of the two (2) comments received from individuals.

<b>Name</b>	Dean Loidolt
<b>Comment Summary</b>	Provided an update to the newest transit service areas and alignments after the termination of a provider.
<b>APO Response</b>	APO staff met with officials from the active service agencies (Tri-Cap and Trailblazer) and has updated the Plan to 2013 ridership and financial figures.

<b>Name</b>	C. Fedyszyn
<b>Comment Summary</b>	Support for the construction of sidewalks in new developments, roadway construction and to schools. Further support for motorized scooters as an alternative form of transportation. And, discouragement of Section 8 housing.
<b>APO Response</b>	The APO will continue to coordinate and cooperate with our member agencies to implement the alternative transportation policies and guidelines established within the Plan. Land use is at the control of local cities and counties and when and where appropriate the APO will provide the necessary information to improve decision making.

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### G.3 MnDOT's Comments

The following is a review and response of the comments received from the Minnesota Department of Transportation (MnDOT).

MnDOT Official Comments	APO Action Taken
<b>Chapter 2</b>	
There are similarities in some of the chapter subheadings. For example, 2.5 is Demographic Trends and 2.7 is Demographic Trends (2000 v 2010). Both sections deal with the same time frame – 2000 to 2010. The subheadings should be clarified.	Clarified
How did APO determine what was considered low, high and very high for minority and low poverty areas? What is the basis for this determination? Why do the categories jump from low to high?	Added text from TIP with the statistical definition
How did APO define poverty? What Census variable was used?	Included census definition
The plan notes the APO economy is among the most vibrant in the country. Where is the data to show this is the case? What is the source of the data? Is the data based on metropolitan areas? Metropolitan statistical areas?	Source listed
Section 2.13 refers to commuters in the St. Cloud metro area. Figure 2.18 refers to residents of the St. Cloud planning area. Are residents and commuters the same population group? Is the St. Cloud metro area and the St. Cloud planning area the same geographic area?	Delineated difference in data sources used
Section 2.16 notes approximately 6% of St. Cloud metro commuters have a commute time over 60 minutes or more. Yet, Section 2.14 notes that 15% of St. Cloud metro commuters have commute times of over one hour. Which figure is correct?	Clarified
For all of the trends, the plan should identify the link to transportation. This linkage could be discussed in chapter 2 or in the individual mode chapters	Improved. The APO will include as part of the next Long Range Plan.
<b>Chapter 3</b>	
The chapter discusses various public involvement tools the APO used during the plan development process. It notes the common themes identified by participants. The plan, though, never documents how public input influenced the plan's policies and priorities. We encourage the APO to more clearly show how the public input received shaped the plan development process and the policies and strategies included in the plan.	Additional text added
Page 21 notes that property taxes are not specifically used for transportation projects. How are local governments providing the local match? What is the source of the funds?	Clarified
For the APO online survey, it would be interesting to compare the demographics of those who took the survey to the APO area in general.	The APO will considering including as part of the next long Range Plan.

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MnDOT Official Comments	APO Action Taken
<b>Chapter 4</b>	
Ensure that there is a clear definition/difference between the goals, objectives and strategies. For example, the first objective under System Connectivity is a strategy and the second objective is almost identical to the goal. The objectives under System Connectivity could be reworked. The first objective is a strategy. The second objective simply restates the goal with the added mention of capacity.	Minor revisions have been made to address this comment. However, the APO feels the Plan's objectives provide the necessary guidance in describing how the goals will be achieved and the objectives should not be viewed as strategies. Additional clarification is needed by MnDOT to make any further revisions.
The System Connectivity goal statement specifies “across and between modes” yet no objectives are identified for bicycle, pedestrian or transit networks.	Revisions have been made to address this comment.
Under System Connectivity, what is meant by regional definitions? Are these definitions defined in the plan? If yes, there should be a reference to the applicable section. The functional classification definitions should reflect the FHWA guidelines.	Revisions have been made to address this comment.
The third objective under the active transportation goal statement should read “encourage the use of context sensitive design principles that foster positive public health outcomes.”	Revisions have been made to address this comment.
The introduction references the SMART principles. While the goals meet the principles, most of the objectives do not.	Minor revisions have been made to clarify how the SMART principles were used in shaping the goals, objectives, and performance measures. Please note the SMART principles were applied as a whole to the entire goal area. In essence, this approach ensured the goal statements were "agreeable," objectives were "sufficient" and "realistic," and, performance measures were "measurable" and "time-bound." Additional clarification is needed by MnDOT to make any further revisions.
The Accessibility and Mobility measures are not written as measures. Written as measures, they would read: Congested lane-miles, VMT, VHT, Miles of roadway exceeding a V/C ratio of 1.1	The APO feels that the performance measures need to include verbiage, such as "minimize" and "reduce" to give the performance measure quantitative direction. Additional clarification is needed by MnDOT to make any further revisions.
The measures of traveler delay and travel time reliability (which will likely be MAP-21 performance measures) would provide the APO with a more meaningful indication of the impact that congestion is having on mobility and accessibility in the region. Delay and reliability are more useful tools for optimizing mobility-driven investments. The APO will have free access to travel speed data on the NHS. MnDOT is looking to purchase data for all roads in the state. If MnDOT purchases this data, the APO would be able to track delay and reliability on both NHS and non-NHS roads.	No revisions have been made.
It is overly complicated and unnecessary to define measures in terms of a 2040 base. A measure should be worded like the bullets above for Accessibility and Mobility. The APO could set targets using its 2040 base projections and then identify projects necessary to meet those targets. That is where the reference to dates should be.	Revisions have been made to address this comment.
Delete percent of functionally classified roadways as a measure under System Connectivity. As noted during the statewide functional classification review meetings, MnDOT will be monitoring compliance with the federal guidelines from a statewide perspective. It is understood that due to differing circumstances, individual regions within the state may not meet the guidelines. Likewise, the tables – as shown – are not correct. The tables should not be combining the principal arterial and collector guidelines.	Revisions have been made to address this comment.

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<b>Chapter 4 (Continued)</b>	
Under System Connectivity, consider replacing the Northstar and I-94 measures with measures of travel time (by personal vehicle, truck and transit) between St. Cloud and Minneapolis.	No revisions have been made. The APO and its partners would like to document their desire to strive for Northstar connection and expansion of I-94.
Measures 13, 14, 18, 20 and 21 are not written as measures. Words such as limit, increase and reduction should not be used in a measure statement/ title. For example, MnDOT's performance measure for pavement is "Share of system with 'Poor' ride quality in the travel lane."	<p>The goals, objectives and performance measures were vetted through a planning process, which included coordination with MnDOT. This coordination included written comments on the draft goals, objectives, and performance measures by Mr. Brian McLafferty on April 3, 2014. MnDOT comments were addressed at that time. In that respect, the APO assumed no further revisions were needed on the Plan's goals, objectives and performance measures. Additional coordination with MnDOT included a kickoff meeting with Deanna Belden to gain a better understanding on MnDOT's approach in developing performance measures. Input from this meeting was used to help shape the Plan's goals, objectives and performance measures.</p> <p>In regards to this comment, staff feels the performance measures provide better quantitative direction when using terms, such as "limit", "increase" and "reduce." Therefore, no changes have been made to the Plan's performance measures. The APO will continue to refine and adopt new performance measures as MnDOT establishes their measures under MAP-21 requirements.</p>
Under Active Transportation, the bicycle and pedestrian counts could be used as an indicator.	Understood - No revisions have been made.
As currently written, the safety performance measure discusses demonstrating the benefits of safety investments by monitoring the change in fatalities and serious injuries at the locations where investments are made. However, it is possible that a more system-wide approach focusing on crash type and behavior would have a greater impact on facilities and serious injuries across the region. Proactive, system-wide applications of low-cost/high benefit treatments are designed to prevent specific types of crashes. Similarly, the section does not mention strategies designed to address traveler behavior. Both of these approaches have proven to be more effective than a worst-first approach at reducing fatalities and serious injuries within financial constraints.	Please note the Roadway System Plan Chapter provides a Transportation System Management (TSM) Plan, which emphasizes low-cost/high-benefit safety solutions. Minor revision to the Plan's objectives have been made to incorporate low-cost/high-benefit safety solutions. However, additional clarification is needed on whether or not performance measures need to be added to track low-cost/high-benefit treatments and travel behavior.
The data used the pavement and bridge conditions narratives is dated. For example, the narrative references the CIMS analysis completed in 2012. The data used in the CIMS analysis would have been from an earlier year. It would be better to use the 2012 pavement and bridge data that MnDOT provided to the MPOs in March 2014.	The APO has updated this chapter using MnDOT's 2013 pavement condition data.
Performance Measure 13 notes that APO will begin to evaluate the National Highway System. With the exception of CSAH 75, all other NHS routes in the APO area are under MnDOT's jurisdiction. For this reason, the text should note that the APO will work with MnDOT as the state evaluates the National Highway System.	Minor revisions have been made to address comment.
<b>Chapter 5</b>	
The land use projection discussion should be expanded. How was the land use forecast prepared? What steps were used? How was it constrained?	Reconfigured Chapter to include land use and population forecast detail and order. Added Appendix E to the end of the Plan including presentation on Forecast methodology.
The population projection discussion should be a separate section. It also needs to be expanded. How was the population projection prepared? What steps were used? What were the different projections that were examined? How did the projections differ? How/why was the projection chosen?	Reconfigured Chapter to include land use and population forecast detail and order. Added Appendix E to the end of the Plan including presentation on Forecast methodology.

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<b>Chapter 6</b>	
The traffic calming discussion notes that many of the examples provided are expensive or significant changes to the physical environment. The next sentence notes that one of the best elements of traffic calming is that it can be applied inexpensively. Is changing lane lines the only inexpensive example? If yes, the statement is incorrect that traffic calming is inexpensive. Clarify the discussion.	Clarified
The chapter notes that the alternative management strategies will help alleviate congestion management issues. The chapter provides examples of various actions such as traffic calming, but it does not specifically state what APO will do. It would be beneficial if the APO identified future actions for each section. For example, APO will work with (or encourage or support) local jurisdictions to implement mixed use and transit oriented development.	Additional text added to conclusion of Chapter.
<b>Chapter 7</b>	
As stated at the mid-year review meeting in May, the chapter must reference the Minnesota Statewide Regional ITS Architecture. Refer to <a href="http://www.dot.state.mn.us/guidestar/2006_2010/its_planning_and_regional_architecture.html">http://www.dot.state.mn.us/guidestar/2006_2010/its_planning_and_regional_architecture.html</a> for more information	Data source has been referenced
The chapter should have a conclusion. Recommend using Chapter 6 as an example with the Moving Forward section.	Added brief 'moving forward' statement. We will have to analyze our direction with ITS more closely in the future
<b>Chapter 8</b>	
The Minnesota 20-Year State Highway Investment Plan (MnSHIP), particularly years 11-20, focuses on preservation and asset management. In addition, MAP-21 places a strong emphasis on preservation and asset management. While the 35% expansion target identified in the APO plan is for local projects, it does not reflect state and federal trends in focusing on preservation and asset management.	The plan's extended timeframe will be used to quantify the preservation needs and an implementation plan to address these identified issues (??)
The chapter states federal-aid eligible roadways are defined as roadways classified as collector or above. This is only partially correct and applies only to urban roadways. The APO has both urban and rural roadways. The chapter should clarify that federal-aid eligible roadways are Minor Collector and above for urban roadways and Major Collector and above for rural roadways.	Clarified in the text to differentiate the minor and major collectors
The functional classification discussion should be shortened. In terms of the number of pages functional classification is discussed within the plan, the topic is overrepresented. Chapter 4 includes future functional classification tables.	No change made based on APO guidance
The chapter notes a relationship between the number of full access points and the rate of crashes. To expand on this discussion, the plan could also note the relationship in regards to the severity of crashes.	Added text to expand on the potential contribution to severity rates and types of crashes that occur at full access points
Figure 8.8 discusses the APO's access management guidelines. The guidelines include a note that MnDOT's Access Management Manual should be used when addressing state-owned facilities. A similar statement should be included within the text discussion.	Added text to include this note in the main body of the chapter too
The system analysis notes that the modal split was confirmed and included in the model. What is the modal split?	This text was a hold over from another source. The APO model did not include an adjustment for modal split (as received from D Then). Sentence has been deleted.
The chapter identifies the roadways that will experience LOS of E or F. The chapter does not discuss the relative time these segments experience congestion. For example, is it AM/PM peak congestion? Does the congestion occur for one hour? Two hours? This information would provide a broader picture of the situation and need.	The LOS E/F deficiencies are based on daily ADT values and are not broken down by time of day; therefore, stating how long throughout the day this expected to occur is not possible
The chapter identifies three different scenarios. How were the scenarios chosen? How do they differ? Some the projects have very low V/C ratios.	The paragraph that precedes the first build scenario definition covers this comment
Verify the project locations on the approved project list match the project locations in the scenarios. For example, Benton Drive is identified on the approved list but not identified as part of any of the scenarios.	Only projects identified by the V/C analysis were included in the early build scenario review. Following the technical analysis, and consideration of the build scenarios presented earlier, the TAC developed a refined preliminary project list for consideration given the fiscal constraints and potential system benefits. This included new alignments that were considered as part of past planning activities (e.g., CSAH 133, CSAH 29, and 33rd Street - SW Beltway).
For the unmet needs lists, MnSHIP identifies TH 23 in St. Cloud (see Appendix I). The APO should work with the District 3 office to identify any other projects that should be included in the plan.	This is an area that the APO can expand on as part of the amendment process and timeline with the DOT, etc.

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<b>Chapter 9</b>	
Figure 9-1 does not identify safety as a goal, yet safety is identified under section 9.2. The role of safety should be clarified.	Clarified
Figure 9-1 could identify additional measures such as the number of bicycles, the number of pedestrians, or the percent of trips that are non-motorized (which can be calculated using the bike/ped counts or using ACS data).	Addressed already in Chapter #2
The performance measure/indicator descriptive text could be deleted, and the chapter could reference chapter 4 for more information. If the text is not deleted, the example performance indicator should be relevant to bicycles and pedestrians.	Text deleted
Standards are not identified in the MnDOT Bicycle Modal Plan. The standards are identified in the MnDOT Bikeway Facility Design Manual. You may also want to reference the 2012 AASHTO Guide for the Development of Bicycle Facilities and the NACTO Urban Bikeway Design Guide. MnDOT has endorsed these guides.	Source was referenced
The first paragraph in section 9.4 is confusing as written.	Clarified
The Complete Streets resolution is out of context. It is also not needed. If it remains part of the document, it should be moved to Chapter 6.	APO staff believes that current location is appropriate.
The Transportation Alternatives Program is a federal program, not a MnDOT program.	Corrected
Safe Routes to School was established under SAFETEA-LU, not MAP-21. It continues under MAP-21 and the Minnesota State SRTS program.	Corrected
The SRTS discussion could be clearer. This region, especially with the help of BLEND, is covering all five E's – education, engineering, encouragement, evaluation and enforcement. To say engineering and educational programming in the region are the main goals is missing a lot of the good work that is taking place.	Clarified
Use the term “crashes” instead of “accidents.”	Corrected
<b>Chapter 10</b>	
Fix the Figure 10-1. It is covering text.	Addressed
The chapter can summarize the key points from the 2010 Moving Forward Plan. Instead of including the assumptions used, simply refer to the 2010 Moving Forward Plan for specific details.	Retained for value to document. Added reference to upcoming Metro Bus Plan
Figures 10-14 and 10-15 show a decrease in the ridership and service hours for dial-a-ride service, not an increase. What occurred? Why the decrease? The text needs to explain the figures.	Added context from Metro Bus
The chapter can summarize the Tri-Cap operating hours information. It seems as if more current information (than 2008) would be available.	Updated to 2013
Intercity passenger rail is not a form of public transit.	Retained for value to document.
The first bullet of the Project Updates for Northstar states the line operated on-time, yet the previous paragraph discusses recent delays due to increased freight demand. Clarify the text.	Clarified language (via Tim Yantos (Anoka County/NCDA))
Figure 10-27 shows a breakdown of funding by agency. What is the time frame of this funding? Is it the initial funding? Ongoing funding? Provide more information.	Clarified language (via Tim Yantos (Anoka County/NCDA))
Recommend deleting Figures 10-28 and 10-29. This information can be summarized in the text. The detail is not needed.	Retained for value to document.
The chapter should use either Figure 10-30 or 10-31. Both figures are not needed.	Retained for value to document.

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<b>Chapter 11</b>	
<p>The statement “no new major highways or capacity improvements on the greater Minnesota Interregional Corridor system are planned in the state’s 20-year plan” is misleading. MnSHIP states that the IRC is expected to meet its mobility performance targets through the year 2023. While IRC system performance is expected to decline and trigger an investment need for years 11-20, MnDOT will be unable to prioritize investments to improve mobility on IRCs given funding constraints during this period. The APO plan should either refer to MnSHIP for specific information or better explain MnSHIP’s strategies as they relate to the IRC.</p>	Source was referenced
<p>The text notes APO developed a survey for key stakeholders to suggest local future trucking freight priorities for the 2035 plan. Is 2035 correct? Should it read 2040? If 2035 is correct, state the year the survey was done.</p>	Clarified
<p>Section 11.4 notes no intermodal facilities exist in the area. This is not correct. While there are no container terminals in the area, three intermodal terminals exist – refer to pages 57-58 of the Central Minnesota Freight Plan (<a href="http://www.dot.state.mn.us/planning/freightplan/central/files/CentralMinnesotaFreightStudy.pdf">http://www.dot.state.mn.us/planning/freightplan/central/files/CentralMinnesotaFreightStudy.pdf</a>). It should also be noted that access to intermodal terminals in Duluth, the Twin Cities and elsewhere is critical to moving freight long distance to and from the St. Cloud area. Finally, MnDOT will be identifying intermodal terminals statewide as part of the Statewide Freight Plan.</p>	Edited the text to include Intermodal terminals profile from 2012 Central MN Freight Plan/Figure 11-2 inserted
<p>An updated Minnesota rail map is available at <a href="http://www.dot.state.mn.us/ofrw/freight/data.html">http://www.dot.state.mn.us/ofrw/freight/data.html</a>. The map includes mileage for each railroad, as well as speed and volume data for each segment.</p>	Map has been updated to 2014
<p>The plan notes there are quiet zones in St. Cloud and Sauk Rapids. Do these quiet zones cover the entire community/all crossings? Or are they focused on a particular area?</p>	Source was referenced
<p>The plan identifies several dams in the St. Cloud area and notes that these limit freight movement by water. The true limiting dam is the Coon Rapids dam. It is the first dam heading upstream from Minneapolis without a lock. However, the Army Corps of Engineers will soon be closing the lock in Minneapolis which will limit potential freight movement by water. For more</p>	Added info on Coon Rapids Dam, etc.
<p>For the strategies identified, MnDOT can serve as a resource. For example, we can assist in working with the railroads to establish rail service (e.g., rail siding, terminal), to establish a quiet zone, or to address crossing safety. We can also assist in identifying truck safety and mobility solutions and freight movement analysis.</p>	APO staff believes this is covered throughout existing text.
<b>Chapter 12</b>	
<p>Is it known why there are no freight providers operating to/from the St. Cloud Regional Airport? Is it due to the proximity of MSP? Additional text would complete the discussion.</p>	Added more context
<p>The most recent State Aviation System Plan was completed in 2013, not 2006.</p>	Adjusted
<b>Chapter 13</b>	
<p>The text notes that Minnesota had the second lowest fatality rate in 2011. Does this mean the second lowest fatality ever in the state? Or does it mean the second lowest fatality rate in 2011 among the states? Clarify.</p>	Additional text added
<p>Clarify what the colors mean in Figure 13-6.</p>	Table of contents added to graphic.
<p>The comment Minnesota has no NHS intermodal connectors is incorrect. The state has several. For a list, refer to <a href="http://www.fhwa.dot.gov/planning/national_highway_system/intermodal_connectors/minnesota.cfm">http://www.fhwa.dot.gov/planning/national_highway_system/intermodal_connectors/minnesota.cfm</a>.</p>	Statement was corrected
<p>US 10 is part of the National Highway System.</p>	Text added to remove confusion.

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MnDOT Official Comments	APO Action Taken
<b>Chapter 14</b>	
While the introductory text is correct as written, it should clarify that a person does not have to be a minority and low-income to be considered part of an environmental justice population. Instead, the executive order covers individuals who are members of a minority population or a low-income population. This is clarified in DOT Order 5610.2(a) issued in 2012.	Clarified
Section 14.3 notes the APO is required to be in compliance with Title VI. A brief description of Title VI requirements should be included.	Added 2012 APO Title VI Policy Statement
The methodology refers to the “study area.” This is confusing since the plan covers the entire metropolitan planning area. Consider using “metropolitan planning area” instead of “study area.”	Addressed
What makes a project exempt from environmental justice? Environmental justice applies to everything – programs, policies and activities. Neither the Executive Order nor the DOT Order provide exemptions.	Clarified
Section 14.8 notes that interagency consultation occurs throughout the plan development process. To ensure the requirements of 23 CFR 450.322(f)(7) and 23 CFR 450.322(g) were met, the plan should provide more information on what occurred. For example, what particular interagency consultation activities were undertaken? What comments did the agencies provide in regards to potential mitigation activities?	Referenced Public Input appendix
The plan does not identify potential mitigation activities. The resources identified are not mitigation activities. As required in 23 CFR 450.322(f)(7), the discussion may focus on policies, programs or strategies rather than the project level.	Added TCM Implementation Strategy table, as well as statement on MN Green Step Cities and St. Cloud Area Sustainability Committee under Mitigation Activities
<b>Chapter 15</b>	
Why do cost estimates end at 2035 when the plan is through the year 2040?	Clarified. Will likely change as part of a future amendment, but was not changed as part of this feedback process.
Add years to Figure 15-10.	Years are not necessary.
Section 15.10 notes that estimates do not include pot-hole filling and crack filling. These activities are part of O&M costs. As required under 23 CFR 450.322(f)(10)(i), the financial plan must include system-level estimates of system operations and maintenance costs.	Clarified. Original sentence refers to the amount available for project specific maintenance projects in addition to O & M costs. These costs are included in Figure 15-10.
Under section 15.6, last paragraph, remove the reference to the Chapter 152 Bridge Program. The sentence should read “This program has the goal of meeting minimum condition levels as defined in MAP-21.”	Corrected
<b>Chapter 16</b>	
Land Use – first bullet – Since this is the 2040 plan, how can the action be to update the plan to 2040?	Date Corrected
Land Use – third bullet – Since this is the 2040 plan, how can the action be to update the information for the 2040 plan?	Date Corrected
Management & Operations – ninth bullet – Clarify what is being assessed. Is it current performance measures?	Clarified
Freight Transportation – first bullet – The Central Minnesota Freight Plan was completed in 2012.	Edited / Clarified
Freight Transportation – sixth bullet – Would this action fit better under Air Quality, Environmental Mitigation and Environmental Justice? Also, are these projects still valid, particularly since they are not identified in this plan?	Statement edited
Air Quality, Environmental Mitigation and Environmental Justice – third bullet – Is this action still valid? This data is already available.	Edited / Clarified

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MnDOT Official Comments	APO Action Taken
<b>General Comments</b>	
<p>When developing future long-range transportation plans, we strongly encourage the APO to share the draft document with its committees prior to releasing the plan for public review. At a minimum, the draft should be shared with the Technical Advisory Committee. While the APO discussed the plan topics with its committees, the committees never had the opportunity to review how the APO translated those discussions into written text.</p>	<p>The APO will include as part of the next long Range Plan.</p>
<p>We also noted the draft plan text does not flow smoothly from topic to topic within the individual chapters. There are numerous typos, grammatical errors, writing style inconsistencies, and ambiguous text.</p>	<p>Individual comments have been addressed.</p>
<p><b>Figures.</b> The text should reference all figures used within the chapter. As currently written, few figures are referenced. While the plan text does not need to go into detail about the figure, the text should provide some basic information. The figures and the text should complement each other. For example, there are seven figures identified for the Tri-Cap discussion in Chapter 10. While the text references some of these figures, it does not provide a basic explanation of each figure.</p>	<p>Effort was made to improve the document. The APO will consider including as part of the next long Range Plan.</p>
<p>In addition, all figures should have the source and date cited.</p>	<p>The APO will consider including as part of the next long Range Plan.</p>
<p>Finally, individual pictures do not need to be identified as a figure or have a caption unless the picture is being used to provide a specific example cited in the text. Instead, the pictures can be used to provide visual appeal and contrast.</p>	<p>Effort was made to improve the document. The APO will consider including as part of the next long Range Plan.</p>
<p><b>Qualifiers.</b> We strongly encourage the APO to avoid the use of qualifiers. The plan should state the facts. For example, delete the word “significant” from the following statement: “These significant increases in VMT and VHT are a direct result of increases in forecasted population and land use” (pg 37). The reader can determine whether the increase is significant.</p>	<p>Effort was made to improve the document. The APO will consider including as part of the next long Range Plan.</p>

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<b>High Priority Concerns</b>	
<p><b>Years 2014-2019.</b> The current APO long range transportation plan expires October 14, 2014. 23 CFR 450.324(g) states that “Each project or project phase included in the TIP shall be consistent with the approved metropolitan transportation plan.” However, the draft plan does not include years 2014-2019. As a result, the TIP will not be consistent with the transportation plan. The APO must add years 2014-2019 to the plan. This includes identifying any expansion projects and/or regionally significant projects that are occurring during time period and updating the financial forecast and analysis. <b>The APO must complete this activity before the plan is adopted.</b></p>	<p>Additional information was added to Chapter 8.</p>
<p><b>Project List.</b> The plan identifies six projects for expansion needs. However, the plan does not identify when it is anticipated these projects will be built. The APO must identify general time ranges when it is anticipated these projects will be undertaken. For example, the APO’s 2035 plan identified 3 time frames. Another recent example would be the Fargo-Moorhead Metro 2040 long range transportation plan. By identifying specific time frames, the APO will be able to better document fiscal constraint by showing whether sufficient funds will be available during the proposed time period.</p>	<p>Will develop and include as part of a Plan Amendment to be approved in February of 2015 and finalized in May.</p>
<p><b>Project Costs.</b> The plan notes the project costs do not include right of way costs or bicycle and pedestrian amenities. To document fiscal constraint, these costs must be included. The APO may use a general rule of thumb calculation for these costs. It is understood these are planning level estimates.</p>	<p>Will develop and include as part of a Plan Amendment to be approved in February of 2015 and finalized in May.</p>
<p><b>System Preservation and Operations and Maintenance (O&amp;M).</b> One of the federal planning factors is “emphasize the preservation of the existing transportation system” (23 CFR 450.306(a)(8)). The plan notes that the approved funding target percentages are 65% for preservation and 35% for expansion. While the plan notes more funds are being set aside for preservation activities compared to the current long range plan, it does not include a discussion of the current condition of the roadway network, what the preservation needs are or what the estimated preservation costs may be.</p>	<p>Will develop and include as part of a Plan Amendment to be approved in February of 2015 and finalized in May. The APO will work with MnDOT to research and develop a pavement management database in 2015 and 2016 to be in place for the next long range planning cycle.</p>
<p>Closely related to system preservation is system O&amp;M. As required under 23 CFR 450.322(f)(10), the financial plan must include system-level estimates of the costs and revenue sources that are reasonably expected to be available to adequately operate and maintain Federal-aid highways. While the financial analysis includes a high-level discussion of preservation revenue and historic maintenance costs, it does not identify the estimated O&amp;M costs for the planning period.</p>	<p>Will develop and include as part of a Plan Amendment to be approved in February of 2015 and finalized in May. The APO will work with MnDOT to research and develop a pavement management database in 2015 and 2016 to be in place for the next long range planning cycle.</p>
<p>For both system preservation and O&amp;M, it is unclear if the plan is meeting the needs of the APO area. The APO must clearly address the roadway preservation and O&amp;M needs in the plan. The APO is not required to identify individual preservation or O&amp;M projects, but it must clearly document that 35% of federal funding is available for expansion after preservation and O&amp;M needs are met. The financial analysis must be updated to better reflect preservation and O&amp;M costs and document funds are available for expansion. We encourage the APO to refer to the Fargo-Moorhead Metro 2040 plan as an example.</p>	<p>Will develop and include as part of a Plan Amendment to be approved in February of 2015 and finalized in May. The APO will work with MnDOT to research and develop a pavement management database in 2015 and 2016 to be in place for the next long range planning cycle.</p>
<p><b>Transit Financial Plan.</b> The plan does not include a financial plan for the public transit system. This is required under 23 CFR 450.322(f)(10). The APO must develop a financial plan for the public transit system. The plan must include system-level estimates of costs and revenues sources that are reasonably expected to be available to adequately operate and maintain public transportation. We again encourage the APO to review the Fargo-Moorhead Metro 2040 plan as an example.</p>	<p>Submitted from Metro Bus 10/06/14 and added at the end of Appendices (Appendix E)</p>