Citizens League non-partisan public affairs research and education in the St. Paul-Minneapolis metropolitan area. 84 S.6th St., Minneapolis, Mn. 55402 (612) 338-0791

Mr. Jim Harrington Commissioner of Transportation Transportation Building St. Paul, MN 55155

May 31, 1978

Dear Mr. Harrington:

Thank you for the opportunity to comment on the Draft Transportation Plan of Mn/DOT. Our Transportation Task Force headed by Allan R. Boyce has reviewed the plan in light of recommendations in previous Citizens League reports, most notably "Building Incentives for Drivers to Ride", March 1973.

We will divide our comments in two parts: substance and procedure.

First, on substance, the plan is encouraging but too vague on the critical issue of planning new highway construction in the metropolitan area to include exclusive lanes for high occupancy vehicles. The plan promises to "review" all proposals for opportunities to provide preferential treatment, but this is too reactive. Moreover, the plan is deficient in that it doesn't state any objectives against which such a review would be measured.

We therefore recommend an amendment on page "k" of the yellow pages of the draft, after paragraph No. 4, as follows: "It is the position of Mn/DOT that expansion and improvement of roadways in urban areas shall be undertaken with the objective of serving the maximum number of people during peak hours. Mn/DOT will, therefore, plan its roadway capacity for urban freeways in terms of the number of persons/lane/ hour during the peak. For such an objective to be carried out, Mn/DOT will set a vehicle-occupancy goal for the peak hour. If a regional planning organization has established a vehicle-occupancy goal for its area, such a goal will be used by Mn/DOT.

"In all corridors where new or expanded freeway construction is contemplated in the metropolitan area, Mn/DOT will analyze and publish all options, including exclusive lanes for high occupancy vehicles, for meeting the above-stated objectives."

Second on procedure, we note that pages 35 through 68 (white pages) describe the process by which all projects will be evaluated. However, we could not find reference in the white pages to the policies or positions of Mn/DOT as specified in the yellow pages. We believe it is critical that every project be analyzed in light of the specific policies and positions of Mn/DOT. Therefore, we recommend that the planning process as described on pages 35 through 68 be amended to provide that: "Mn/DOT shall review every project in light of Mn/DOT's policy and position statements as stated in its approved State Transportation Plan. If Mn/DOT proposes that a given project deviate from its own policy and position statements, it shall explain its reasons in writing."

Thank you.

Sincerely,

President

Eleanor L. Colborn

CC: Peter Fausch, MN/DOT

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