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November 4, 2009

Commissioner Thomas Sorel
Minnesota Department of Transportation
395 John Ireland Blvd. – M.S. 500
St. Paul, MN 55155
Attention: *Complete Streets*

Re: Comment on the October 2009 Draft Complete Streets Report

Dear Commissioner Sorel:

Mn/DOT's *Strategic Vision* articulates the important mission to "provide the highest quality, dependable multi-modal transportation system through ingenuity, integrity, alliance and accountability" that helps achieve the vision of "a safe, efficient and sustainable transportation system for the future." It is promising to see that the draft *Complete Streets Report* recognizes how Complete Streets can contribute to Mn/DOT's vision and that it offers a concrete recommendation to implement a statewide Complete Streets policy.

Thank you for the opportunity to comment on this important and valuable report. We look forward to working with Mn/DOT to help move from the recommendation to the implementation of a statewide Complete Streets policy. In addition to this letter, we are also submitting more detailed comments on the specific language and elements of the draft report.

Many improvements from committee draft

Mn/DOT deserves credit for the many significant improvements made from the initial committee draft. This updated draft report is clear, concise, well organized, and generally offers a fair perspective on Complete Streets. The conclusions are quite comprehensive and do a good job of answering many of the questions needed to move onto the next step of creating a Complete Streets policy. The recommendations are quite direct and thoughtful and reflect a good understanding of how a policy can add value to Mn/DOT and the state.

Connecting recommendations with action

The strong recommendation to "...develop and implement a statewide Complete Streets policy..." would be enhanced with explicit steps and milestones to reconcile design guidance, requirements, and processes as part of the implementation of a Complete Streets policy. This report does a good job of "establishing the need" for Complete Streets and it should explicitly recognize that this first step toward Complete Streets is accomplished by the report.

Clarifying the definition of Complete Streets

The report should more clearly define Complete Streets as a process not a pre-determined outcome. While it is true that Complete Streets does not mean building design features for all modes on all roads, a Complete Streets process does indeed include *consideration* of all modes in the project development and

scoping process for all roads. It would be helpful to include a short definition of Complete Streets—similar to the one provided on the National Complete Streets Coalition website—at the beginning of the Executive Summary to help frame the topic of the report for a reader that is new to the concept.

Improving discussion of benefits and costs

The chapter on “Benefits, Costs, Feasibility and Funding” should be reworked to reflect a more objective perspective and to better meet the legislative task. The funding discussion should be offered in the “State of the State” chapter as it more directly relates to the background around Complete Streets than to the discussion of benefits, costs, and feasibility.

The report should recognize that its guiding legislation does not call for a formal benefit-cost analysis; it calls for Mn/DOT to “study the benefits, feasibility, and cost of adopting a complete streets policy.” The current draft should be improved to remove bias. The first sentence of the chapter should be changed from its current negative slant about “a common concern,” “expectation of additional costs,” and “uncertainty of the value.” This tone implies that this study of benefits, feasibility, and cost was done from a perspective of skepticism rather than objectivity.

The benefits and costs also need to be backed with support from outside sources. The benefits list, while quite good and defensible, should better acknowledge specific supportive reports, research, or findings either directly (similar to the valuable link to the CDC report on obesity) or with supporting documentation in the appendix. Much of this information can be gleaned from the interviews or is available through the National Complete Streets Coalition. We would be more than happy to offer links to this information.

The cost list does not fully reflect costs of a well-implemented Complete Streets policy and process. This is especially true for the unsubstantiated cost of “reduced emergency vehicle access,” which just does not fit with the Complete Streets philosophy of considering every user through all stages of planning and project development. If anything, Complete Streets should improve access for emergency vehicles and this should potentially be placed on the benefit list.

The wording of the other costs should be reexamined and updated to provide some acknowledgement of magnitude and also some acknowledgement of connected benefits. A Complete Streets process may result in some instances where you would need to purchase additional right-of-way and provide more infrastructure, but it will likely also result in some instances where you can reduce the need to purchase additional right-of-way and build infrastructure by right sizing roadways for their context. Similarly, there may be specific instances where a Complete Streets process would lead to a small increase in travel time for motor vehicles in the short term, but as the benefits point out, there is potential for long-term congestion reduction through a Complete Streets process that helps remove barriers to access and improve system efficiency.

The conclusion of the study of benefits and costs should be changed to recognize that the general consensus is that the benefits of Complete Streets “outweigh the incremental costs” instead of simply offsetting those costs.

Topic areas that deserve more discussion

The background information provided in the “State of the State” and Lessons Learned from Interviews chapters provides good details on what Complete Streets is, what it is not, and how it can contribute to Mn/DOT and Minnesota. These details generally connect with the specific conclusions and recommendations. There are, however, several points that deserve further recognition and integration throughout the report.

- A Complete Streets process can help support compliance with the requirements of the Americans with Disabilities Act, while also making ADA investments more effective by using ADA improvements as an opportunity to improve overall safety and accessibility. While the current report includes limited background on ADA, it never explicitly connects Complete Streets with

ADA. A strong proactive connection should be made clear in the implementation strategies, conclusions, and recommendations sections.

- Consideration of transit vehicles and riders is an integral part of a Complete Streets process. The report should be updated to include a basic discussion of the current barriers related to transit, and to offer concrete implementation strategies, conclusions, and recommendations connecting transit with a Complete Streets policy.
- The list of recommendations should be enhanced by also addressing the maintenance issues raised in the "State of the State" chapter and in the conclusions.
- Collaborative cost allocation is a serious barrier to the implementation of a Complete Streets policy and warrants further discussion in the background and recommendations.
- The current recommendation related to the need for Mn/DOT to serve as a resource to assist local agencies with Complete Streets should be strengthened to reflect the importance of training and other local assistance related to Complete Streets.

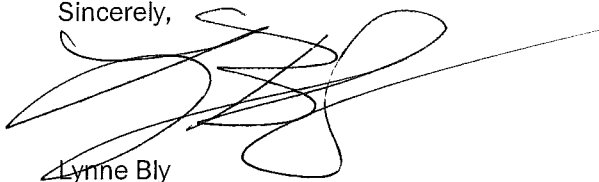
Support for Complete Streets legislation

We are a member of the Minnesota Complete Streets Coalition—a diverse collection of more than 30 organizations (and growing) that support Complete Streets and are promoting Complete Streets legislation during the 2010 session. We hope that Mn/DOT will partner with the MN Complete Streets Coalition to help develop and support this important legislation that can help improve Minnesota's transportation system for generations to come.

Thank you for your consideration. Our more specific comments on the draft report are also attached.

We look forward to working with you on the next steps toward a commonsense Complete Streets policy, and look forward to discussing the details at our upcoming meeting.

Sincerely,



Lynne Bly
Transportation Policy Director

cc: John Powell – City of Savage
Tim Quinn – Mn/DOT
Merry Daher – Mn/DOT State Aid
Rick Kjonaas – Mn/DOT State Aid
Michael Marti – SRF Consulting Group
Rena Kuehl – SRF Consulting Group

Detailed comments on October 2009 draft Complete Streets report

Cover

- The background picture does not appear to be of an intersection that was designed with a Complete Streets process. While Complete Streets is a process—not a pre-determined outcome—the pictures should represent good examples of streets or intersections where Complete Streets thinking was used.
The upper-right picture is another picture that does not seem to reflect a Complete Streets process. That environment looks completely unsafe and uninviting for the pictured cyclist. It would also be nice to include a picture of a rural setting where Complete Streets thinking was used. We would be happy to share some pictures if helpful.
- There should be a wheelchair icon included on the cover to reflect the importance of thinking about the needs of people with disabilities throughout a Complete Streets process.

Executive Summary

- The first sentence (and subsequent bullet point) should be reworded slightly to reflect that the legislation requests a study of the “benefits, feasibility, and cost” of a Complete Streets policy. The current language might be perceived as a request for a formal cost-benefit analysis, which is not the purpose of this report.

Recommendations

- In addition to reviewing and revising conflicting information in design guidance documents, the report would be considerably strengthened by recommending the same update be done for design requirements as needed.
- The current recommendation on the scoping process would be more clearly stated as “Mn/DOT should integrate Complete Streets into the project development process by fully implementing the scoping process model.”
- A Complete Streets policy can serve as a catalyst for better integration between state agencies. The current recommendation related to state agency transportation planning should be refocused on more collaborative and integrated planning rather than simply more planning. Complete Streets is about improving existing processes rather than creating entirely new ones.

Accessibility Compliance (starting on page 14)

- The full ADA transition plan, while underway, has not been completed yet as suggested by the fourth bullet point.

Feasibility (starting on page 20)

- Hennepin County and the City of Rochester have passed Complete Streets resolutions *and* Complete Streets policies. The City of St. Paul has also passed a resolution and is developing a policy, while the City of Albert Lea has a Complete Streets subdivision policy.
- It is an understatement to say that the passage of these policies shows that Complete Streets are “feasible” on the local level. A more apt word or phrase should be used.

Conclusions

- The Design point suggesting “an ‘outcome’ lag” is misleading. Much of the background offered elsewhere in the report shows that there are still guidelines, requirements, and processes that need to be updated to reflect a Complete Streets policy and process. This bullet should be eliminated or changed to reflect that progress has been made, but that there is room for more.
- On the bottom of page 26, NCSC should be spelled out here since some readers may only look at the conclusions and recommendations sections.