

**December 18, 2009**

**Kristie Billiar**

**Mn/DOT Transportation Dept.**

**395 John Ireland Blvd 670**

**St. Paul, MN 55155-1899**

**Dear Ms. Billiar,**

**Fargo-Moorhead Metropolitan Council of Governments has reviewed the Mn/DOT ADA Transition Plan and has several comments that it would like to share. As the City of Moorhead grows there will be a greater need for pedestrians to cross TH 75 and TH 10 on a regular basis. Pedestrian connections to commercial, education and public services are negatively affected when safe options for crossing roadways and entering pedestrian ways safely and confidently don't exist. It is incumbent upon Mn/DOT to work fastidiously to meet the needs of all pedestrians in Moorhead and on roadways under its jurisdiction. Public input gathered through the development of the Moorhead Comprehensive Plan and Active in Moorhead (AIM) Partnership neighborhood survey support the need for additional pedestrian improvements along major transportation facilities in Moorhead.**

**Metro COG recognizes the need for accessible pedestrian signals (APS) on Trunk Highway (TH) 10 and TH 75, as well as updates to curb ramps along these corridors; and lauds Mn/DOT on its statewide inventory of such intersections. Metro COG looks forward to working with Mn/DOT in the years ahead to ensure the timely and efficient programming of these needs within the Metropolitan Transportation Improvement Program (TIP). Metro COG would encourage Mn/DOT to develop an implementation schedule that**

ensures the timely upgrades of these intersections; and would hope that Mn/DOT would cooperate with Metro COG and the City of Moorhead in the development of a prioritized list of future improvements.

Metro COG looks forward to working with Mn/DOT- District 4 in CY 2010, 2011, and 2012 to complete a two phase corridor study along large portions of TH 75 and TH 10. This planning study will assist in identifying solutions and should develop an implementation plan for needed improvements to signalized intersections along TH 10 and TH 75. Metro COG would encourage Mn/DOT to use Metro COG's Unified Planning Work Program (UPWP) to more closely examine needed signal upgrades along TH 10 and 75 with other projects or activities included within the Metropolitan Transportation Improvement Program (TIP).

As signal upgrades are considered along TH 10 and TH 75, Metro COG encourages Mn/DOT to remain cognizant of the 2008 Metropolitan Intelligent Transportation Systems (ITS) Plan and the 2009 FM Metropolitan Traffic Operations Action Plan. Both documents set a priority on the upgrade and interconnect of signal systems in the FM Metropolitan Area. Metro COG would encourage Mn/DOT to consider ITS and signal operations as it considers signal system upgrades along TH 10 and TH 75.

As Metro COG continues to plan for a comprehensive metropolitan pedestrian network, the need to provide all pedestrians a safe and predictable way to cross roadways is absolutely essential. Another critical aspect of the pedestrian network in Moorhead is the opportunity to engage safely and comfortably in the use of the public transit system. Mn/DOT's right of way features for transit stops take into account grade, connectivity, and placement.

**Mn/DOT should encourage municipalities to consider implementing Mn/DOT's right of way features for transit stops. However, Mn/DOT should set a minimum standard regarding transit stop "sheltering" such as auxiliary lighting, heat, etc; such improvements increase the accessibility of public transit for all user groups.**

**The "full array of transit vehicles specifications" allowed by Mn/DOT should be expanded to include more appropriate sized vehicles, based on local need. There are many examples of smaller accessible vehicles. The current Mn/DOT vehicles specifications available to applicants is limited to small buses, which are often more costly than smaller options. An exemption to ADA accessibility for Mn/DOT funded transit vehicles should be considered in areas already being served by a mandated ADA provider.**

**Metro COG appreciates the opportunity to provide these comments to Mn/DOT and looks forward to working cooperatively with the State towards ensuring a more accessible environment. If you have suggestions, or comments regarding the information included, please don't hesitate to contact me directly.**

**Sincerely,**

**Wade E. Kline, AICP**

**Executive Director**

**Fargo-Moorhead Metropolitan Council of Governments**