



September 24, 2024

Charlie Zelle, Chair
Metropolitan Council
390 Robert St. N.
St. Paul, MN 55101

Re: Dakota County Comments on the Imagine 2050 Transportation Policy Plan, Parks Policy Plan, and Water Policy Plan

Dear Chair Zelle:

On behalf of the Dakota County Board of Commissioners, thank you for the opportunity to comment on the draft Imagine 2050 Policy Plans for the Metropolitan Region. This letter includes comments on the draft 2050 Transportation Policy Plan, the draft 2050 Parks Policy Plan, and the draft 2050 Water Resources Policy Plan.

Comments on the Draft Imagine 2050 Transportation Policy Plan

Transportation is a vital element of the future prosperity and success for the Region. This holds true in Dakota County where an efficient transportation system will be a critical factor to support our planned growth. The Transportation Policy Plan is intended to guide long-term transportation policy by setting goals, policies, and priorities for maintaining and improving the Region's transportation system. This remains a difficult task, considering today's challenges including needs for investment in preserving the current system, providing multi-modal solutions, and addressing current constraints including highway funding.

- The Plan acknowledges the importance of the regional highway system and includes data showing that 85% of all trips in the region are taken with a personal vehicle, and that the highway system is important for supporting all modes, including transit, freight, biking, and walking. The plan also appropriately notes that rural areas are highly dependent on roadways for personal travel. Despite this acknowledgement, the Regional Goals and supporting objectives provide minimal direction to highway investments and improvements. Dakota County recommends inclusion of additional objectives and actions that support highway safety, mobility, and modernization.
- The Plan's Greenhouse gas emission and vehicle miles traveled (VMT) reduction goals should be established with an understanding of how these can be achieved in all areas of the region, including suburban and rural areas with limited options for transit and other modes.
- While the County agrees that it is important to acknowledge and understand the benefits and impacts of all transportation investments to residents and members of underserved communities, the plan focuses on the harm caused by highways and minimizes benefits that highways provide for all modes. With this focus on the negative aspects of highways, the Plan understates the significant needs in the region for investment and modernization of the regional highway system and the potential benefits that highway improvements can provide. Dakota County suggests including a more balanced discussion of highways that both acknowledges the disproportionate harm highways have had on some communities while also identifying how highway investment and safety improvements for all modes can benefit all residents of the region. These benefits include economic development through the efficient movement of goods and services, and safe routes for residents to get to their homes, jobs, and places of commerce that are not located on transit lines.

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- The Plan documents increased funding for transportation at the state level and new distribution formulas at the Minnesota Department of Transportation (MnDOT) that will result in increased funding for the regional highway system in the Metropolitan Region. The plan identifies several principles for prioritizing MnDOT's additional funding in the region. Dakota County would like to see an emphasis on MnDOT projects that address modernization of its aging arterial system. Highways such as Trunk Highway (TH) 3, TH 50, and TH 55 are important corridors and connectors for Dakota County, yet these corridors have not been updated or modernized since their initial construction. These two-lane rural design highways lack pedestrian and bicycle infrastructure, turn lanes, shoulders, and drainage systems adequate to handle today's needs. Dakota County suggests adding an item to the Work Program section of the Policy Plan in coordination with MnDOT to prioritize investments in MnDOT's aging non-freeway arterials for corridors in greatest need of modernization improvements that go above and beyond pavement preservation.
- The Transit Investment chapter identifies that over the 26-year timeframe of the Plan, there is \$1.5 billion in unallocated regional sales tax funding. The Plan does not discuss how that funding will be prioritized but that there will be a future process to decide on how these funds will be invested. Dakota County would like to see a robust regional discussion about transit needs across the region and how this funding source can be utilized to improve transit in all areas of the region.
- Dakota County supports the Plan's inclusion of system planning for additional principal arterials and the recognition that the arterial grid is not fully developed in growing parts of the region. The County appreciates the inclusion of Dakota County's planned principal arterials in the text of the plan. The County suggests incorporating one or more action items related to Principal Arterial system planning.
- While the County recognizes the requirement for the plan to be fiscally constrained, the plan should identify needs and issues that are a priority to address when additional resources are identified and provide more information about planned projects in the region beyond the small subset of "regionally significant projects."
- The Functional Classification chapter describes Principal and Minor Arterials, which make up the Regional Highway System, as barriers to pedestrian and bicycle travel. The chapter goes on to state that Principal Arterials are not intended to serve bicycle and pedestrian trips and that Minor Arterials should prioritize pedestrian and bicycle investments in certain areas with concentrations of jobs and transit. While this may be true for principal arterials that are freeways, this statement contrasts with the Plan's Policies and Actions which focus heavily on pedestrian and bicycle safety and access on the Regional Highway System, many of which are divided highways. While we recognize the challenge of providing multimodal access to destinations, which are often concentrated along these highways, the Plan should reconcile these contradictory statements. The Plan should also provide more emphasis on technical support and guidance to all entities on how best to support multimodal travel on Principal and Minor Arterials.

Comments on the Imagine 2050 Parks Policy Plan

The 2050 Parks Policy Plan provides the framework needed for the regional park implementing agencies to manage and improve the Metropolitan Regional Park System and guides regional park investments that are important to the citizens of Dakota County. The Dakota County Board of Commissioners recognizes the overall purpose of the RPPP, and offers the following general comments and concerns:

- **Regional Goal #5.** "We protect, integrate, and restore natural systems to protect habitat and ensure a high quality of life for the people of our region." The natural systems protection, integration, and restoration work that Counties do ensures a high-quality of life for all living things in the region. This is supported later in the plan on page 19 in an objective that states "Protect and restore: Protect and restore natural systems to safeguard the well-being of all living things." Dakota County recommends changing the regional goal to take a more holistic approach.
- Dakota County appreciates the acknowledgement of system growth impacting the need for additional operations and maintenance costs in the Growing Pains section on page 17. Operations and

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Maintenance (OM) funding as required by Statute has never been realized. Dakota County supports the full funding of OM need.

- Dakota County requests additional clarification in the Policy Plan on how to designate a bridging facility.
- Dakota County supports counting bridging facilities in annual park user counts.
- Dakota County suggests that the Metropolitan Council partner and consult with tribal communities in order for a landscape to be designated as a Cultural Landscape.
- Dakota County has identified some geographic gaps in regional park service areas as part of the County's draft 2050 parks system vision, particularly in the northern areas and in the western areas of the county where more residents are underserved by regional parks. Additional time is needed to complete this analysis and the county may propose new units in these areas after study completion. Dakota County's current plan from 2008 identified Thompson County Park as a potential joint opportunity for a regional park. Dakota County recommends that the Parks Policy Plan show this area as a search area.
- The existing OM funding formula is inadequate for funding natural resources management. Dakota County recommends consideration of establishing a dedicated fund, particularly for long-term maintenance after restoration.

Comments on the Imagine 2050 Water Policy Plan

The WRPP provides goals and strategies related to wastewater, water supply and surface water planning, management and operation. All of these issues are important issues to the citizens of Dakota County.

Roughly 96% of households in Dakota County are served by a wastewater treatment facility. The remaining 4% of households have subsurface treatment systems (SSTS), systems that require maintenance and a cost-effective means for disposal.

About 95% of Dakota County's water supply is from groundwater. Several municipalities within Dakota County are in the top 20 groundwater-based water suppliers in Minnesota. In addition, Dakota County is among the highest users of agricultural irrigation groundwater in Minnesota.

- The Water Policy Plan places emphasis on utilizing the Priority Waters List for decision making throughout the plan. The Priority Waters List does not have substantial influence over local protection or enhancement efforts. Local efforts are guided more by Total Maximum Daily Load (TMDL) requirements, restoration plans, or other local plans and studies. Dakota County recommends the Met Council utilize TMDL, restoration plans, and local water plans and studies for prioritizing efforts.
- The Water Policy Plan identifies working with agricultural landowners to help promote best management practices (i.e., pages 1-32, 1-37). Dakota County recommends the Met Council work with the Soil and Water Conservation Districts (SWCD), watershed organizations or other local agencies that have established relationships and are a trusted source of information with the agriculture community.
- When considering tools and resources to better understand pressures on and interconnections between water resources, it is important for local governments to have water supply sustainability targets for regional planning to prevent issues that occurred in White Bear Lake from occurring elsewhere. The State agencies or Met Council should update groundwater models to help identify regional sustainability targets for development planning. (Policy 2, page 1-32 – 1-33; and Policy 5 page 1-37)
- Wastewater System Plan, PFAS, PFOS, PFOA Section, page 2-67: The Met Council appears to be reactionary vs proactive in addressing PFAS in wastewater discharge and biosolids and only proposes to address concerns if regulation is proposed and adopted. PFAS contamination is a growing concern in the Metro Region. The Met Council has a responsibility to support reduction of

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PFAS sources to the environment, even if there is not a current state or federal requirement. Dakota County recommends the Met Council identify within the Wastewater System Plan what is currently being completed to reduce PFAS in waste streams and identify PFAS reduction goals based on reasonably anticipated future regulations. For example, the Met Council can support its partnering state agencies in identifying ways to reduce these inputs upstream where possible and applicable.

- Partners' roles and relationships, Page 1-24: The paragraph at the top of the page states that "...private well owners plan, partner, and implement water projects at the local scale." Individual private well owners do not typically implement water projects and this section appears to be treating all private well owners as a local water organization. Dakota County recommends removing private well owners from this list since not included in Table 1.3 or clarify this as large water users such as industrial, or non-community (non-municipal) wells.
- Policy 5 and 6, Pages 1-36 – 1-39: Dakota County recommends defining and differentiating between water conservation vs water reuse. The difference between the two may be confusing to the general public.

Thank you for your consideration. We appreciate your attention to these comments and look forward to working with you towards final versions of the Imagine 2050 Policy Plans that will best serve the needs of the Twin Cities region through 2050. If you have any questions about our comments or would like clarification, please contact Georg Fischer, Physical Development Director, (952-891-7007) at georg.fischer@co.dakota.mn.us.

Sincerely,

Joe Atkins, Chair
Dakota County Board of Commissioners

Cc: Dakota County Board of Commissioners
Heidi Welsch, County Manager

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