Passenger Rail Community Engagement

Draft Final Report

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Prepared for:



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Executive Summary

Kimley-Horn was hired to conduct a public engagement process within the City of Edina to answer the following questions:

- Should the City of Edina request elimination of the "gag rule" (Laws of Minnesota 2002, Chapter 393, Section 85)?
- Should the City dedicate resources to developing a plan to encourage the development of passenger rail service in Edina?

Based on high-level review of the corridor and feedback from the public, Kimley-Horn recommends the following:

- No, the City of Edina should not request elimination of the gag rule at this time.
 - High level evaluation and previous studies of the Grandview area indicate it could be served well by some type of transit service in the future, but currently it falls in the bottom1/3 in household, population, and employment densities when compared to existing and planned transit station areas in the Twin Cities.
 - Adjacent residents and businesses have expressed strong opposition to passenger rail in the Dan Patch Corridor. This strong opposition is not uncommon for a rail project; but there was also not a strong faction of vocal supporters. Especially with the legislative challenges of the gag rule, strong champions are essential.
 - This opposition is likely to remain in the future, unless a stronger case can be made for transit. This requires new development and land uses changes that will take several years to realize.
 - Eliminating the gag rule cannot be done by Edina alone, and must involve other cities along the corridor. At this time, adjacent cities are focused on other investments and do not view passenger rail in the Dan Patch corridor as a priority.
 - While conditions are not yet fully ripe for a higher transit investment in the Dan Patch Corridor *at this time*, if the city continues to invest in new types of development and higher densities in the Dan Patch corridor, it may be worth evaluating in the future as an option alongside other transit corridors.
- No, the City should not dedicate resources to developing a plan to encourage the development of passenger rail service in Edina in the Dan Patch Corridor at this time.
 - Throughout this process, the public has tied both questions specifically to the Dan Patch Corridor. Therefore, for the reasons listed above, at this time the city should not dedicate resources to developing a plan to encourage the development of passenger rail service in the Dan Patch Corridor.
 - There are overall indicators that suggest Edina could support additional transit options, such as unique demographic and community patterns. Previous engagement efforts in the city, as captured in the *Vision Edina* document, have indicated the community's desire for enhanced transit.
 - The city should invest time and resources into looking at other corridors as possible transit corridors. This may also include consideration of other modes of transit in addition to passenger rail. The city should also invest in diversifying land uses and building up specific nodes to further support expanded transit options.

1.0 Background and Purpose

1.1 Study Purpose

The purpose of this study is to provide a recommendation to the Edina Transportation Commission (ETC) regarding the future of passenger rail service in Edina, specifically answer these two questions:

- Should the City of Edina request elimination of the "gag rule" (Laws of Minnesota 2002, Chapter 393, Section 85)?
- Should the City dedicate resources to developing a plan to encourage the development of passenger rail service in Edina?

Kimley-Horn has recommended answers to these questions based on a public engagement process, planning study and document review, and existing conditions and policy analysis. This report serves as our recommendation to the Edina Transportation Commission (ETC). The ETC will then make a recommendation to the Edina City Council.

1.2 Study Background

1.2.1 History of the Dan Patch Corridor

The Dan Patch Electric Railroad began service from Minneapolis to Northfield, MN in 1910 and was in operation until 1942. The Dan Patch line ran along what is now the Canadian Pacific Railway (CP Rail) railroad, which in Edina runs north-south over four miles through the entire city, just west of Highway 100. Currently, freight trains on this portion of the CP Rail line are operated by the Twin Cities and Western (TC&W) Railroad. Approximately two trains run through Edina on CP Rail per day—one in the morning and one the evening.

In 1999 the Minnesota Department of Transportation (MnDOT) identified the Dan Patch as a commuter rail corridor, connecting Lakeville to the Minneapolis central business district. The corridor was included in the Metropolitan Council's Transit 2020 Master Plan in 2001. It was prioritized third of the three planned commuter rail lines at the time.

In 2001 Dakota County studied the feasibility of commuter rail on the Dan Patch line between Northfield and Minneapolis. The



report concluded that while the implementation of passenger rail transit service in the Dan Patch corridor is physically possible, the real and perceived adverse impacts and high costs made corridor improvements impractical at that time.

In 2002, the MN legislature adopted the Dan Patch "gag rule" (Laws of Minnesota 2002, chapter 393, section 85), which prohibits the Met Council, MnDOT, and regional rail authorities from taking any action or spending any money for study, planning, preliminary engineering, final design or construction of the Dan Patch commuter rail line. The 2010 (and draft 2015) Statewide Rail Plan identifies the Dan Patch corridor for intercity passenger rail within 20 years.

1.2.2 Current Interest in Passenger Rail in Edina

Some residents and City officials have continued to express interest in the possibility of passenger rail in Edina. The subject of rail service in Edina was not part of any City Council, City department or Board/Commission work plan, so in April of 2016 City Council directed the Edina Transportation Commission (ETC) to review and recommend whether the City of Edina should assume a position in favor of the addition of passenger rail to the community.

Specifically, the City Council directed the ETC to include findings on the following key questions:

- Should the City of Edina support further study of the possibility of passenger rail service in Edina?
- Should the City of Edina request elimination of the "gag rule" (Laws of Minnesota 2002, Chapter 393, Section 85)?
- Should the City dedicate resources to developing a plan to encourage the development of passenger rail service in Edina?

"Passenger rail" as defined in this process includes all modes that travel on rail tracks. This can include intercity rail, commuter rail, light rail, or streetcar. Each of these have distinct differences in total system length, frequency of service, distance between stations, and cost.

Mode		Peak Period Frequency	Typical System Length	Relative Capital Cost Per Mile	Average Station Spacing	Tracks Shared with Freight?
Intercity Rail*		Daily service	50-500 miles	\$\$	20 miles or longer	Yes
Commuter Rail*		Every 30+ minutes	20-50 miles	\$\$\$	7 miles or longer	Yes
Light Rail*		Every 10 minutes	10-20 miles	\$\$\$\$	l mile	Possible
Streetcar		Every 7-15 minutes	I-5 miles	\$\$\$- \$\$\$\$	I/8 to I/4 mile	No

* Vehicle propulsion technology can be diesel, electric, or diesel multiple unit (DMU)

In October of 2016, the ETC recommended to City Council that the City support further study of the possibility of passenger rail service in Edina (effectively answering "yes" to the first question above). Recommended answers to the second and third questions were to be the outcomes of this Passenger Rail Community Engagement Report. City Council approved these recommendations (and conducting this study) in November of 2016.

2.0 Planning Context

2.1 Planning Study and Document Review

The interconnected nature of the regional transit system demands an awareness of the multitude of initiatives that are ongoing in the Twin Cities region and in Minnesota. A *Planning Study and Document Review* memo (Appendix A) was prepared in July 2017 and reviewed the following documents:

- Dan Patch Corridor Commuter Rail Feasibility Study (2001)
- City of Edina Strategic Vision and Framework (2015)
- Transportation Chapter of Edina's Comprehensive Plan (2008)
- Metropolitan Council 2040 Transportation Policy Plan (2015)
- Metropolitan Council Regional Transitway Guidelines (2012)
- GrandView District Development Framework (2012)
- MnDOT Statewide Rail Plan Update (2015 draft)

This review illustrated three key messages related to passenger rail in the Dan Patch Corridor.

First, it is technically feasible to implement passenger rail in the Dan Patch Corridor. The Dan Patch Corridor Commuter Rail Feasibility Study (2001), the Transportation Chapter of Edina's Comprehensive Plan (2008), and the MnDOT Statewide Rail Plan Update (2015) all suggest that the Dan Patch Corridor has the potential to carry passenger rail.

Second, there was significant resistance to using this corridor for commuter rail in the late 1990s and early 2000s, which led to the adoption of the "gag rule." This community opposition was discussed in the *Dan Patch Corridor Commuter Rail Feasibility Study* (2001) and is reflected in the excerpt from *Laws of Minnesota 2002, Chapter 393, Section 85*.

Finally, more recent plans and policy documents indicate that there is interest in more transit options in Edina. The *MnDOT Statewide Rail Plan Update* (2015) referred to public support for passenger rail generally in Minnesota and specifically between Minneapolis and Northfield by way of the MN&S subdivision, which travels through Edina. The *City of Edina Strategic Vision and Framework* also expressed public support, especially among younger residents, for the integration of diverse transportation options. The *GrandView District Development Framework* (2012) also expresses public support for increased transit options and specifically mentions the desire to preserve the CP Rail corridor for possible public transit and non-motorized movement/connection in the District.

3.0 Existing Conditions

3.1 Demographic Data

The City of Edina has some unique demographic characteristics compared to peer cities:

• People who live and also work within the city of Edina total about 24% of the working population, leaving about 76% of people who commute to other places.²

- Over 47,000 workers are employed by the more than 6,800 businesses in Edina, with a vast majority of these workers commuting into the city from elsewhere.¹ The daily population of Edina increases by over 18,000 people during a workday (+36%)²
- Edina has a high population of seniors compared to other cities and the state—21% of population is 65 or older (38% of those are living alone).³ Aging populations have different needs—lower income, different housing, access to healthcare—and are often more dependent on transit.

3.2 Changes Since 2001

The Dan Patch Corridor Commuter Rail Feasibility Study is often referenced in current discussions of passenger rail service in the Dan Patch Corridor. Below is a summary of demographic and system changes since that study was completed in 2001, that are important to consider in the discussion of passenger rail.

- The total population of Edina is estimated at around 51,000. Population changed only by about one percent between 2000 and 2010 (47,425 to 47,941), but increased by another seven percent between 2010 and today.⁴
- The opportunity to connect to other transit lines is a consideration in the success of a new transit line. Fixed transit did not exist in the Twin Cities region in 2001. Since then, Blue Line LRT from Minneapolis to the Mall of America, Green Line LRT between Minneapolis and St. Paul, and Northstar Commuter Rail between Minneapolis and Elk River have been implemented. Investment has been made in advancing extensions of the existing Blue Line ("Bottineau" service to northwest suburbs) and Green Line ("Southwest" service to southwest suburbs).
- The existing freight rail traffic in the Dan Patch Corridor remains about the same as it did in 2001 (about 1-2 trains per day). Some freight improvements/track improvements have been made recently which may lead to increased freight traffic, though specific railroad plans are not known.

The 2001 study found commuter rail in this corridor to be feasible but impractical due to real and perceived impacts, and cost of implementation. With updated information and the benefit of new technologies, different results may be possible with updated information. It is also important to note that feasibility of different modes in this corridor (LRT, high speed rail, streetcar, etc.) have not been studied.

3.3 Station Area Comparison

The success of transit in any given corridor is based on the travel demand between origins and destinations along the corridor. The travel demand is driven in part by the density of use along the corridor, especially at station areas.

Because the Dan Patch Corridor has not been studied to a level of sufficient detail, service type and station locations are not determined. A comparison was conducted for the land use within one mile of stations at current and planned transit corridors in the Twin Cities region, and a station at Grandview in the city of Edina. Grandview was chosen because it is identified in approved city planning documents as a potential future location for a transit station. The comparison includes population density, household density, and employment density.

Based on the metrics of household, population, and employment density⁵ for the 46 other station areas evaluated, the example station area at Grandview performs as follows:

• Households – 20 station areas (43%) have less or similar household density to the Grandview station area

¹ Vision Edina: Community Profile and Benchmark Analysis (2014) <u>https://www.edinamn.gov/DocumentCenter/View/1627</u>

² <u>http://www.city-data.com/city/Edina-Minnesota.html</u>

³ <u>https://www.seniorcare.com/directory/mn/edina/</u>

⁴ U.S. Census 2000 and 2010 and 2016 Population Estimates

⁵ Current data based on U.S. Census 2010, projections based on Metropolitan Council forecasts

- Population The Grandview area currently has about 5 people per acre with the density forecasted to decrease to 4.7 people per acre in 2040. 18 station areas (39%) have less or similar population density to the Grandview station area. This number falls to 13 (28%) in the year 2040. Four people per acre is a good minimum benchmark for some level of increased investment in higher frequency transit.
- Employment The Grandview area has about 1.6 employees per acre. 12 station areas (26%) have less or similar employment density to the Grandview station area. In 2040, this decreases to 4 station areas (9%).

The Grandview area, as a representative example of a potential station area, falls within approximately the bottom 1/3 of the station areas studied. Household density is the strongest, while employment density faces some challenges. However, there is enough household, employment, and population density to warrant a deeper look at future conditions for transit. Furthermore, some of the discussion around the Grandview District and Grandview Green concept may result in higher densities than what is included in current published plans. The success of a station at Grandview also is highly dependent on other factors such as end points, type and frequency of service, number of stations, and connection to other transit service.

Technical evaluation of this corridor is based on previous studies, as well as collection of data at a very high level. For specific data on the stations evaluated, see *Existing Conditions and Policy Analysis* in Appendix B.

4.0 Policy Analysis

4.1 "Gag Rule"

In 2002, the Minnesota Legislature adopted legislation that prohibits the Metropolitan Council, MnDOT, and regional railroad authorities from expending any money for study, planning, preliminary engineering, final design, or construction for the Dan Patch commuter rail line (Laws of Minnesota 2002, Chapter 393, Section 85). The legislation defines Dan Patch as "the commuter rail line between Northfield and Minneapolis identified in the Metropolitan Council's Transit 2020 Master Plan." This is nicknamed the "Gag Rule."

The Gag Rule is unique—we are not aware of this type of legislation prohibiting study of a specific corridor anywhere else in the United States. Typically, the next step in a transit planning process would be to look at a range of alternatives, which would include a broader look at different corridors and modes. Prohibiting study of a certain corridor limits the study of a broader range of alternatives and leaves this corridor out of a regional conversation.

It should be noted that the Gag Rule specifically references a commuter rail line. It could be argued that other modes could be studied. However, prohibited agencies seem to have interpreted this more broadly, assuming study of any service type in the Dan Patch corridor is restricted.

Removal of the Gag Rule would not guarantee that anything would be implemented in this corridor, or even that it's the best place for transit investment—only that more detailed study can be conducted. There are a lot of questions that cannot be answered without the ability to study the line further. This level of study is cost prohibitive for one city (or even multiple cities) to fund. Funding for such a study is administered through larger agencies, such as the regional railroad authorities, Metropolitan Council or MnDOT, and carried out in coordination with the affected cities. The larger agencies are currently prohibited from studying this corridor.

Any lobbying efforts to lift the gag rule would need strong champions, and not just in Edina. Partnership with other cities along the line is essential, and service in the Dan Patch Corridor is not a priority for other cities right now. Implementation of the Green Line Extension is the priority for St. Louis Park and Hennepin County Regional Railroad Authority. Bloomington is indifferent to the possibility of passenger rail at this time. In the past, Northfield has

expressed some interest in connecting to the metro via this line, but little is known about the appetite of other cities along the line.

5.0 Public Input

The City of Edina in its Request for Proposals (RFP) indicated "public engagement is the primary component of this effort." When laying out the goals for the engagement process, Kimley-Horn and city staff agreed to a goal of at least 500 to 1,000 "touches" on this project. In this case, a "touch" was defined as a survey response, attendance at a public meeting (people who signed in), a written comment (comment sheet or email), attendance at a stakeholder meeting, and/or specific phone calls to discuss the study. This process met the goal, with over 900 touches.

Summaries of all public input can be found in Appendix C.

Activity	Number of Touches	Method of Notification		
Online survey responses	515	City Facebook page, neighborhood NextDoor pages (city-wide), mention at community conversation #1		
Attendance at Community Conversation #1	183	Press release, city Facebook page, postings to neighborhood NextDoor pages city-		
Attendance at Community Conversation #2	97	wide, fliers posted at businesses in the corridor		
Comment sheets	104	Available at community conversations		
Comments submitted by email or U.S. mail	40	City contact information available on project fact sheet and website		
Phone conversations and/or attendance at stakeholder or business meetings	10	Invitation calls to Bloomington, St. Louis Park, Hennepin County, MnDOT, Metropolitan Council Postcards sent to XX businesses in the corridor, follow-up emails sent to XX businesses for which email contacts were available		
Total Touches	949			

5.1 Summary of Public Feedback

Through the combination of opportunities listed above, participants identified the benefits, challenges, and questions surrounding the potential for passenger rail in the Dan Patch Corridor.

Overall, feedback was predominantly negative towards passenger rail in the Dan Patch Corridor. About 70% of comments opposed any study of passenger rail service in this corridor, while about 25% suggested it was worth taking a further look. About 5% did not state a preference and requested more information.

5.1.1 Benefits

Attendees at the first Community Conversation and via the online survey were asked *What are the potential benefits of passenger rail in the Dan Patch Corridor*? The most common responses are listed below, ordered by number of responses (i.e. benefit identified the most times is at the top of the list):

- Better connect the region
- Access to downtown Minneapolis
- Transportation options
- Reduce traffic on roadways
- Economic development around stations
- Convenience/easy access
- Environmental benefits/sustainability
- Easier commute
- Attractive to young/potential new residents
- Increase overall use for entire metro system
- Support increase in population and employment

Comments from other sources were similar in nature to these responses. It is also important to note that about 45% of the online survey respondents (about 230 people) indicated there would be no benefit, weren't sure, or didn't answer the question.

5.1.2 Challenges

Attendees at the first Community Conversation and via the online survey were asked *What are the potential challenges of passenger rail in the Dan Patch Corridor*? The most common responses are listed below, ordered by number of responses (i.e. challenge identified the most times is at the top of the list):

- Decrease in property values
- Neighborhood impacts (character, traffic, access)
- Increased noise and vibration
- High cost, low benefit (especially to Edina vs. other cities)
- Cost/funding sources to build and maintain
- Safety concerns
- Increased crime
- Not a significant improvement over current bus/rapid bus system
- Lack of ridership
- Fear of change
- Lack of support (local and legislative)

5.1.3 Information Needs

Attendees at the first Community Conversation and via the online survey were asked *What is important for the city to know as information is gathered on existing conditions/policy around passenger rail?* The most common responses are listed below, ordered by number of responses.

- Effects on home values
- Impacts to neighborhoods—noise, traffic, parking, safety

- What other transit options might be (location and mode)
- Clear benefits to residents of Edina vs. other cities
- How it will be used/how many will be served
- Where stations and parking would be located
- Railroad plans
- Costs, including operation and maintenance
- Good metrics on existing transit lines
- Status of Green Line Extension
- Overall timeline/steps for implementing a passenger rail project

Many of the questions above would be addressed in subsequent phases of a transit study, like an alternatives development process and environmental impact analysis. The experience of other transitways in the region has been approximately 20 to 30 years from planning to revenue service. If further study of commuter rail was desired in the Dan Patch Corridor, removal of the "gag rule" would be required. It would be reasonable to expect at least an 8- to 10-year duration to revenue service, since there has been prior planning done in the corridor:

- Pre-Project Development Study and Development of Locally Preferred Alternative: 2 years
- Preliminary Engineering and Environmental Documentation: 3 years
- Final Design: 2 years
- Construction and Testing: 2 years

5.1.4 Additional Information – Property Values

The fear that passenger rail in the Dan Patch Corridor would negatively affect residential property values was an overwhelming concern heard from participants. Based on a map review of the corridor, there are roughly 200 residential properties adjacent to the line.

Documented research consistently reports that homes within a half-mile to one mile of a transit station see an increase in home values over time. Supporting research that specifically references the Twin Cities region includes:

- American Public Transportation Association (APTA) and the National Association of Realtors (NAR)⁶ 2013
 - Studied transit lines in Boston, Chicago, Phoenix, San Francisco, and Twin Cities
 - Property values of houses located near transportation with high-frequency service performed 41.6 percent better than similar properties in a region
 - Sales prices within a reas within a half mile of a fixed transit line saw lower declines in recession
- Minneapolis Area Association of Realtors (MAAR)⁷ 2016
 - Value of homes in neighborhoods near Blue Line stations in Minneapolis are higher than homes in neighborhoods that are not
 - Similar dynamic expected along Green Line Extension
 - Exception Kenwood neighborhood, where the price effect is expected to be minimal due to low turnover rates of homes
 - St. Louis Park and Hopkins home values expected to perform quite well
 - Minnetonka and Eden Prairie values expected to perform in the middle

⁶ <u>https://www.minnpost.com/cityscape/2013/03/how-mass-transit-influences-good-way-twin-cities-real-estate-values</u>

⁷ <u>http://www.startribune.com/access-to-transit-helping-boost-home-values-in-some-parts-of-the-twin-cities/377115681/</u>

There is some evidence from other markets that different market segments may perform differently in terms of effects on home values. For instance, a 1992 study of residential properties near Atlanta, Georgia rapid transit stations⁸ saw an increase in home values for low income neighborhoods, but a decrease in some high-income neighborhoods. A Swedish study⁹ also indicated a greater benefit to lower income homes than higher income homes near commuter rail stations.

While there is extensive research on property values around transit stations, there is limited study of homes along a rail line between stations. The *Dan Patch Commuter Rail Feasibility Study (2001)* did address negative effects to property values, but the results were inconclusive. The following is excerpted from pages 94-95 of the study, regarding properties between stations:

Between stations, along line-haul segments of track, as much as a 20 percent decrease in residential property value was found for residences within 400 feet of MBTA's Fitchburg line, which shares tracks with active freight service (Armstrong 1994). In a study of the CalTrain commuter rail system, it was concluded that the negative externalities associated with being extremely close to an at-grade rail transit line were not necessarily capitalized into home values, where homes within 300 meters (325 feet) of the CalTrain track sold at a discount of \$51,000 in 1990 (Landis et al. 1994).

According to Landis, "... the CalTrain system did not generate property value benefits similar to those of the BART system because CalTrain offered limited accessibility benefits. Compared to CalTrain, BART had a superior level of transit service and greater parking capacity. In addition, the negative impact observed in areas close to the station was believed to have been caused by the high noise levels generated by the CalTrain service. CalTrain was described as being much louder than the BART system. The CalTrain trackbed is minimally separated from adjacent uses, and given that the CalTrain train cars are not specifically designed for quiet operation, this is not a surprising finding."

According to Armstrong, "The fact that both freight rail service and commuter rail service operate upon the Fitchburg line... makes it difficult, if not impossible, to accurately differentiate between the two separate sources of proximity impacts. Therefore, the findings concerning the effects of commuter rail generated proximity impacts, independent of freight rail proximity impacts, are inconclusive."

The referenced studies are the only ones that discuss decreases in property values for residences located between stations. All other studies cite either no impact or a positive impact.

Based on limited research, a decrease in property values along a passenger rail line is possible, but impacts to property in general are also dependent on the overall design of the line and other overall factors like mode and type of service, land use and zoning policies, connection to other transit modes, accommodations for parking, and managing noise levels.

6.0 Conclusions and Recommendations

Based on high-level review of the corridor and feedback from the public, Kimley-Horn recommends the following:

- No, the City of Edina should not request elimination of the gag rule at this time.
 - High level evaluation and previous studies of the Grandview area indicate it could be served well by some type of transit service in the future, but currently it falls in the bottom1/3 in household, population, and employment densities when compared to existing and planned transit station areas in the Twin Cities.

⁸ Impacts of Rail on Transit Property Values, <u>http://reconnectingamerica.org/assets/Uploads/bestpractice083.pdf</u>
⁹ <u>http://www.sciencedirect.com/science/article/pii/S0966692316300151</u>

- Adjacent residents and businesses have expressed strong opposition to passenger rail in the Dan Patch Corridor. This strong opposition is not uncommon for a rail project; but there was also not a strong faction of vocal supporters. Especially with the legislative challenges of the gag rule, strong champions are essential.
- This opposition is likely to remain in the future, unless a stronger case can be made for transit. This requires new development and land uses changes that will take several years to realize.
- Eliminating the gag rule cannot be done by Edina alone, and must involve other cities along the corridor. At this time, adjacent cities are focused on other investments and do not view passenger rail in the Dan Patch corridor as a priority.
- While conditions are not yet fully ripe for a higher transit investment in the Dan Patch Corridor *at this time*, if the city continues to invest in new types of development and higher densities in the Dan Patch corridor, it may be worth evaluating in the future as an option alongside other transit corridors.
- No, the City should not dedicate resources to developing a plan to encourage the development of passenger rail service in Edina in the Dan Patch Corridor at this time.
 - Throughout this process, the public has tied both questions specifically to the Dan Patch Corridor. Therefore, for the reasons listed above, at this time the city should not dedicate resources to developing a plan to encourage the development of passenger rail service in the Dan Patch Corridor.
 - There are overall indicators that suggest Edina could support additional transit options, such as unique demographic and community patterns. Previous engagement efforts in the city, as captured in the *Vision Edina* document, have indicated the community's desire for enhanced transit.
 - The city should invest time and resources into looking at other corridors as possible transit corridors. This may also include consideration of other modes of transit in addition to passenger rail. The city should also invest in diversifying land uses and building up specific nodes to further support expanded transit options.

It is our opinion that the Dan Patch "gag rule," or any such prohibitive rule, is an impediment to truly objective regional transit planning. However, revoking such a rule would take a tremendous amount of time and effort, and based on the status of this corridor in Edina today and the lack of any strong support faction at this time (including essential partners in other cities), it is our opinion that the City of Edina's time and resources are better served on other planning efforts. This includes study of other potential transit corridors, and implementing city policies to better support transit options for Edina residents and workers.