

Guiding Framework Community Engagement Summary



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OVERVIEW

This Community Engagement Summary details the approach used to engage our customers and residents of the communities we serve, and presents the results and themes of that engagement. The themes identified in this document inform the development of the Network Next Principles.

The Network Next Guiding Framework sets the overall direction for all improvements to be developed and evaluated in the plan. It identifies the Principles and Actions Metro Transit will use to develop the vision for the bus network of 2040 and defines the approach for how the improvements will be evaluated and prioritized.

Policy Guidance, the Performance of the Current Network, and Outreach and Engagement with our customers and the communities we serve: these three inputs help us to understand the needs of our community, articulate what we are trying to accomplish with the transit network, and define the path forward.

Regional Transit Policy

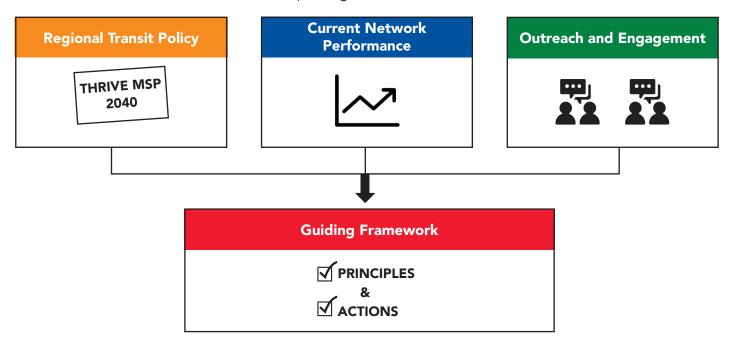
The Metropolitan Council's Thrive MSP 2040 long-range plan and the 2040 Transportation Policy Plan, as well as other supporting policies and plans, outline the high-level transit priorities that all the regional transit providers work to advance.

Current Network Performance

The current bus network was reviewed based on several key metrics and a market analysis of potential opportunities to better align with travel patterns. This review identifies key bright spots to reproduce, challenges to address, and opportunities to take advantage of.

Outreach and Engagement

The policy direction from the Metropolitan Council forms the basis for the Principles and Actions guiding the development of Network Next. However, the policy direction provided leaves the more detailed network design decisions up to the several regional transit providers, including Metro Transit. We engaged with our community members, customers, and local government partners regarding their priorities for improvements and how to resolve some of the tradeoffs inherent to transit planning.





KEY ENGAGEMENT QUESTION: NETWORK DESIGN DECISIONS AND TRADEOFFS

Metropolitan Council policy forms the basis for the Network Next Principles. However, regional transit policy leaves more detailed network design decisions up to regional transit providers, like Metro Transit.

To gain a better understanding of what our customers and community members want from their transit network, the Network Next Guiding Framework outreach and engagement effort was organized around the network design decisions and tradeoffs outlined below.

Network Design Decisions and Tradeoffs

Transit planners consider several network design decisions when planning for bus service improvements or adding new routes to the bus network. In many cases, these design decisions are closely related to each other.

In other cases, these design decisions present tradeoffs. Because operating resources are finite, planners and policy makers need to decide which types of improvements to emphasize at the expense of the others. Below are the types of design decisions and tradeoffs that Metro Transit will need to consider in the development of improvements for Network Next.

Frequency, Span, and Coverage

The tradeoffs between frequency, span, and coverage represent the core of the network design decisions that are presented to planners and policy makers.



frequent frequent service for a shorter time

service for a longer time

Frequency

Frequency refers to how often the bus travels along a route. Today, typical frequencies on Metro Transit service range from one bus every 60 minutes to one bus every 10 minutes, with some high-ridership routes increasing to one bus every seven or eight minutes during rush hours.

The benefits of increased frequency are less waiting, more flexibility, and "insurance" against service delays or missed buses. Frequent service, usually thought of as service coming at least every 10 to 15 minutes, begins to allow people the flexibility to travel without needing to adhere to a specific schedule and change their plans easily. These benefits are amplified when people have access to a network of frequent service, as opposed to a single route.

Span of service refers to how many hours a day bus service is available. Span of service on Metro Transit routes varies considerably, with some express routes operating only in rush hours and other core local routes operating for up to 20 hours a day. A few routes have 24-hour service in the urban core.

The benefit of increased span is providing service for trips occurring earlier in the morning or later in the evening. Often, these trips are second- or third-shift jobs, <mark>shopping and errands, or</mark> visiting friends and family. Wider span of service enables transit to serve the needs of more people.



Coverage

Coverage refers to the geographic footprint of the transit network: the number of people or size of the area with access to some transit, regardless of the frequency of service. Today, about 54% of the people living in Metro Transit's service area live within a 10-minute walk or roll of all-day transit service.

The benefit of coverage is expanding the number of people that have access to some transit. This is particularly important for transit's role in providing social service connections to key destinations and services.

Route Design and Access

Considerations about route design and access revolve around the tradeoff between speed and convenience of service and walking or rolling distance to service. Simpler routes following a direct path tend to allow for faster, more frequent service and rely on transfers to expand access to destinations. More complicated routes with less direct paths tend to provide shorter walks and potentially fewer transfers but slower speeds and longer overall travel times.



More routes with less frequent service but fewer

transfers

routes
with more
frequent
service
but more
transfers

Transfers

It is impossible to connect every potential origin and destination by a one-seat ride on a single route. Every transit network depends on transfers between routes to effectively serve its customers, but there are decisions to be made about where and how to prioritize between having fewer, higher frequency routes with more transfers or more, but lower frequency routes with fewer transfers.

Overall, transit customers tend to dislike transfers, however, frequent service and good connections between routes can reduce the inconvenience and improve the overall usefulness of the transit network.

Directness



Slower, less direct service with shorter walks to stops Faster, more direct service with longer walks to stops Directness refers to how straight a path a route takes as it travels through a corridor. Direct routes stay on a single primary roadway for most of the route without making deviations, while indirect routes make frequent turns to serve stops nearer to destinations just off the primary roadway.

Direct routes tend to provide faster travel times for most customers and have a lower overall operating cost. They are also simpler to display and communicate on a map, making it easier for customers to understand the service.

Indirect routes will reduce walking and rolling distances to destinations along the corridor but will have slower overall travel times for most customers and a higher operating cost. Because of the increased complexity of the route, they can be confusing for customers to understand.



Stop Spacing

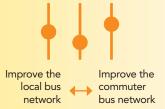
Stop spacing refers to the distance stops on the same route are spaced apart. Most local routes in Metro Transit's system stop every 1/8 to 1/4 mile, which is about once every other block. Arterial BRT routes stop less frequently, typically every 1/2 mile.

Like indirect routes, routes with close stop spacing tend to reduce walk and roll distances to the bus stop for some customers but have slower travel speeds along the route. Because of the slower average speeds, close stop spacing tends to increase overall operating costs as well.

Routes with wider stop spacing tend to have faster travel speeds for most customers while some people will have to walk or roll farther to the bus stop. Bus stops on routes with wider stop spacing still tend to be located at major destinations and transfer points, where most people are getting on and off the bus, so the number of people with longer walk or roll distances tends to be relatively low.

Service Distribution

Service distribution refers to how transit resources are distributed across service types and geographic area.



Service Type

Broadly speaking, transit services can be grouped into two general categories – local service and express service. Local service (including arterial BRT) typically serves multiple different trip types, beyond the 9-to-5 commute, and provides service throughout the entire day. Express service tends to focus on work trips into downtown or a major employment center, usually running only in the rush hours, or with only limited service in other times.

Local services tend to have higher ridership, serve a broader group of people, and have lower per-rider operating and capital costs. Because one of the primary goals of express service is to mitigate rush hour freeway congestion it typically only operates during the rush hours, requiring additional peak buses that are not used during the midday, and they depend on park-and-ride lots to attract customers. These requirements tend to higher capital and operating costs compared to local service.



Geographic Distribution

Geographic distribution refers to how transit service is allocated across Metro Transit's service area. This concept is closely related to the tradeoffs between coverage and frequency. Transit service can be distributed in several ways across a region, in proportion to population, social need, unit of government, or geographic area.

ENGAGEMENT APPROACH

To help answer these questions and reach our customers and community, Metro Transit developed an engagement approach that included a customer-focused transit tradeoffs preference survey, community-hosted engagement, stakeholder presentations, and direct outreach to customers at major transit facilities.

Transit Tradeoffs Preference Survey

Metro Transit developed a survey focused on customer preferences for the tradeoffs outlined above. The survey was distributed from Sept. 1 to Dec. 31, 2019 in several ways:



- Pop-up events and community-hosted conversations: Metro Transit held Network Next pop-up events at 14 transit centers and park-and-ride facilities throughout the Metro Transit service area. At these events, customers were asked to complete the survey and were provided a courtesy ride coupon as an incentive for their participation. Additionally, surveys were distributed by Network Next grantee groups during their engagements. Six hundred and forty-five paper surveys were collected.
- Online: The online version of the survey was promoted via the Metro Transit website, social media, the Network Next email update, Metro Transit Riders Club, and direct emails to community stakeholders and partners. Respondents returned 1,694 online surveys.

Pop-up Events

Metro Transit staff held Network Next pop-up events at 14 transit centers and park-and-ride lots throughout the Metro Transit service area. At these events, Metro Transit staff spoke with customers about their priorities for transit improvements. Customers who completed the tradeoffs survey received a courtesy ride coupon in exchange for their participation.

Pop-ups were held throughout fall 2019 and usually ran for 2-3 hours. The locations were selected to ensure geographic coverage of Metro Transit's service area, engage riders using both express and local services, and maximize the number of customers engaged.



Community-hosted Conversations

Metro Transit provided small grants to 13 groups to host and facilitate conversations with community members focused on transit priorities. The purpose of these community-hosted conversations was to broaden the reach of Metro Transit's engagement and ensure a diversity of voices within the process.

Grantees were selected with consideration for their connection to local communities that are geographically or demographically representative of our region and the current bus service network area through previous organizing, advocacy, or art engagement efforts. The formats of the meeting, time, duration, and methods to engage were developed by each group.

In addition to discussing transit network design tradeoffs and community priorities for transit improvements, each host was provided the following five questions as discussion prompts as needed:

- What type of service improvements should Metro Transit prioritize?
- What about the current transit network works well for you?
- Where are there gaps in our network?
- How have you been inconvenienced on a transit trip in the past?
- What would help you to ride more often?

The table on the following page shows the groups selected to facilitate community-hosted conversations.



Organization or Group	Geographic Focus	Description of engagement and audience	
Asian Media Access	Minneapolis, North	Hosted focus group style workshops with youth from North Minneapolis as a part Youth Leadership Camp.	
DARTS	Dakota County	Hosted large meeting with residents of Dakota County, focused on elders and persons with disabilities. Participants from cities including: Hastings, Lakeville, Apple Valley, Burnsville, Mendota Heights, Inver Grove Heights, South St. Paul and West St. Paul	
District 1 Community Council	Southeast St. Paul	Hosted community meetings with residents within District 1 near Sun Ray and Highwood Hills Elementary School.	
Donte Curtis, Catch Your Dream Consulting	Midway neighborhood, St. Paul	Hosted world café style discussion with diverse group of primarily St. Paul residents, including University of Minnesota students and Ujaama Place participants.	
Greater Eastside Community	Greater Eastside, St. Paul	Hosted meeting with residents of Greater Eastside, including gardening group comprised of primarily Hmong elders.	
Minneapolis Highrise Representative Council	Minneapolis	Utilized area council meetings with representatives of the 42 Minneapolis Public Housing Authority (MPHA) high-rises.	
Nokomis East Neighborhood Assoc.	Bossen Terrace Area, Minneapolis	Hosted small group discussions with residents from the Bossen Terrace Area, primarily residents of color.	
Payne Phalen Community Council	Payne-Phalen, St. Paul	Utilized Payne Phalen Community Council board meeting to host discussion with residents.	
Powderhorn Park Neighborhood Assoc.	Powderhorn Park, Minneapolis	Hosted pop-up at Midtown Global Market, as well as "Advocacy Shop," an online forum for community members to express opinions and ideas.	
Resource West	Hopkins, Minnetonka, Golden Valley, Excelsior	Hosted small group discussions with Transit Assistance Program users and residents with low-income in Minnetonka, Excelsior and Hopkins. Conducted phone interviews with participants unable to attend.	
Sprockets	St. Paul	Hosted large group workshop with students from St. Paul.	
Ashley O'Neill, Tamales Y Bicicletas	Phillips neighborhood, Minneapolis	Hosted small group discussion with a cyclists and residents primarily from the Phillips neighborhood in South Minneapolis.	
Angela Williams, Housing Resource Network LLC	Minneapolis	Connected with riders at high traffic community spaces, businesses and events in Minneapolis.	

Additional Engagement

In addition to the conversations hosted by Network Next grantees, staff also provided information to or attended community events and community meetings to share information about Network Next and the survey. These activities include:

- Franklin Open Streets
- Highland Park Community Council Transit Meeting
- Capitol River Council Public Forum
- Frogtown/Rondo Reconciliation Lunch at Rondo Library
- Hamline Midway Elders Annual Thanksgiving Lunch



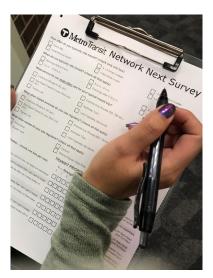
SURVEY RESULTS

Survey Respondents

Seventy-five percent of survey respondents indicated that they ride transit at least once a week, with about 30% answering that they ride every day. About 30% of respondents indicated they ride during rush hours; however, the distribution of responses was relatively even across the day.

Local Bus was the most common mode of transit used with 50% of respondents indicating it was their primary mode, followed by Light Rail with 22% of respondents and Express Bus with 16% of respondents. Driving alone, bicycling and ride hail options were indicated as the most likely modes outside of transit.

As shown in Table 1, the demographic composition of survey respondents is closer to the demographic composition of the Metro Transit Service Area than Metro Transit Riders. About 72% of survey respondents identify as White, with those identifying as Black or African American making up 12% of respondents. As shown in Table 2, the household income distribution of survey respondents is closer to matching Metro Transit Riders than the Metro Transit Service Area, but still skews higher income than riders overall.



Approximately 53% of respondents identify as female, 43% identify as male, and the remaining 4% of respondents identify as transgender, non-binary, or preferred not to answer.

Table 2: Demographic Comparison

Race/Ethnicity	Metro Transit Riders (Source: 2016 TBI On- Board Survey)	Metro Transit Service Area (Source: ACS 2016 5-Year Estimates)	Survey Respondents
White	55%	76%	72%
Black/African American	24%	10%	12%
Asian	7%	8%	5%
Two or more selected or other race	6%	4%	4%
Hispanic/Latino	5%	7%	4%
American Indian/ Alaskan Native	2%	Less than 1%	3%
Native Hawaiian/Pacific Islander	Less than 1%	Less than 1%	Less than 1%

Table 3: Household Income Comparison

Household Income	Our Customers (Source: 2016 TBI On-Board Survey)	Metro Transit Service Area (Source: ACS 2016 5-Year Estimates)	Survey Respondents
Less than \$15K	18%	9%	15%
\$15-25K	15%	8%	8%
\$25-35K	14%	8%	6%
\$35-50K	20%	12%	17%
\$50-100K	17%	31%	23%
\$100-150K	11%	17%	18%
More than 150K	5%	15%	12%

Survey Preferences

The core of the survey was a series of questions asking respondents to indicate their preference between two types of improvements posed as tradeoffs. The tradeoffs are based on the network design decisions and tradeoffs discussed above.

Respondents want improved bus frequency on weekdays and weekends. They want it to be easier to take the bus to more places not accessible or difficult to access today. Customers strongly prefer prioritizing faster travel speeds over shorter walking distances and direct service.

Overall, respondents slightly prioritized added coverage over increasing frequency, but also indicated a preference for emphasizing frequency and transfers over direct service on lower frequency or peak only routes. Respondents also indicated a preference for allocating more service where people ride the bus more often, rather than spreading out service to cover all areas of the region evenly.

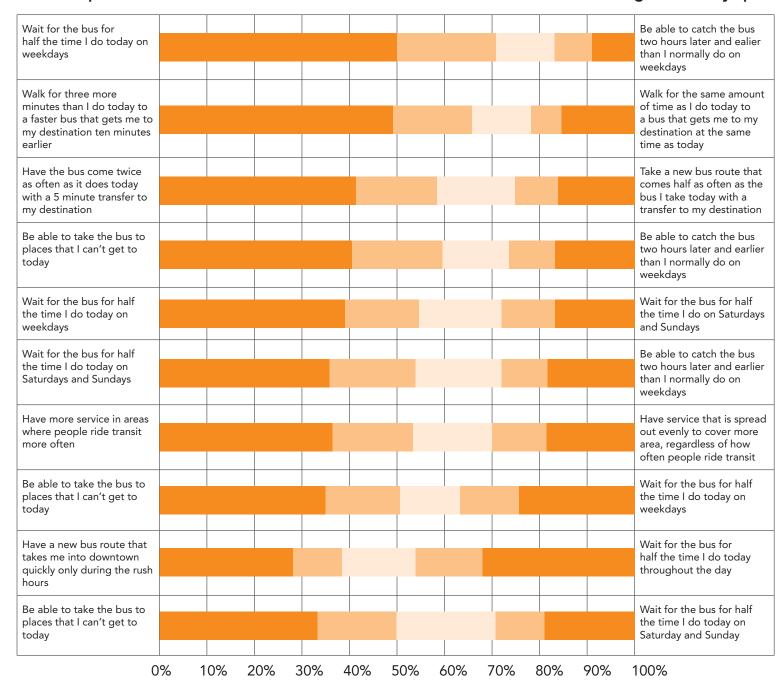
Only a few respondents prioritized additional span of service in early mornings and evenings, new routes to provide one-seat rides or peak-only service to downtowns.

The questions and responses are shown on the graphic on the following page.



More frequent service

Longer weekday span





THEMES FROM OUTREACH AND ENGAGEMENT

The themes identified below incorporate the results of the community-hosted conversations, pop-up events in Metro Transit's service area, and the results of the tradeoffs preference survey.

Frequency, Span of Service, and Coverage

Improve the weekday and weekend frequency of existing service

Overwhelmingly, participants in the community-hosted conversations identified increasing the frequency of existing service as one of their most important improvements. Long wait times, and the additional planning lower frequencies require, were identified as major barriers to using transit at all and major sources of inconvenience and disruption when using transit.

This feedback was almost always coupled with comments related to the need for not only frequent but reliable service. Besides reducing wait times, frequency was identified as a value because it offset the issue of missing a bus or making up time when a bus is late. Bus overloads on the highest ridership routes were also cited a reason to increase frequency and ensure on-time buses.

Participants articulated a need for more weekend service, more closely matching the frequency and span of service available on weekdays. A desire for a single weekend schedule, as opposed to different schedules for Saturdays and Sundays, was a common theme as well.



"I like the 15-minute increments that my bus routes run, such as the 11 line, 2 line, 18 line, C Line, A Line and trains."

"More frequency, including weekend service. I feel like the weekday only service is kind of an archaic schedule. Nowadays we have our shops and whatever else open on weekends and evenings. Being able to take a bus there whenever it is."



Make it easier to take the bus places that are difficult or impossible to access today

Many participants reported that it was difficult or impossible to access many of the places they travel today using the bus. Making it easier to use transit for more of their trips was identified as a desired improvement. Survey respondents rated being able to take the bus to places that are difficult or impossible to access today as one of their most important priorities.

Access to key individual destinations in suburban areas were identified as an important improvement. These included suburban jobs, educational institutions, grocery and shopping, and support services. Overall, a lack of convenient access to transit and the consequent long walks or unavailability of transit altogether were significant reasons given for choosing other modes like driving over transit.

Much of the conversation around coverage centered around the inconvenience and long overall travel times resulting from using transit. Many participants felt that they could get to their destination eventually using transit but that it takes too long using the existing bus network. Participants in suburban areas identified the need for more suburb-to-suburb service to avoid having to go all the way downtown. In conversations held in more urban areas, particularly the in the eastern portions of St. Paul, coverage improvements were framed as wanting additional service on crosstown routes that emphasize a more grid-like network.





"It would be great to have buses that travel within and around the area – not just to downtown and the burbs and back. If there was a bus that traveled on every major street in the area – cross streets as well as streets that run into downtown – then I might be able to make it work."

"Commutes can be long – there can be too much time to read. We had an individual who, she would miss the transfer on a long commute, which would be an express bus waiting to get to another express bus would be a long time or she would have to take a number of buses to get where she wanted to go, so that's a problem. Suburb to suburb transit, for example."

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Target span improvements to ensure the availability of return rides

While span improvements were not identified as a major priority by survey respondents, lack of evening service for express routes was named as a deterrent in community-hosted conversations. Participants often discussed the difficulty of relying on transit when there is no "return ride" to their home destination. Survey respondents living in suburban areas were more likely to rate span improvements as important.



"Late-night services are important. Highrise residents have been stranded, for example, when leaving a hospital, because of the lack of late bus service."

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Route Design and Access

Prioritize faster, more frequent service to reduce overall travel times

Reducing overall travel time emerged as one of the key themes from the outreach and engagement effort. By significant margins, survey respondents prioritized improved travel times over reducing distance to bus stops and minimizing transfers.

Participants in community-hosted conversations also prioritized shorter travel time over minimizing transfers. This was particularly true if the transfers were convenient and didn't require long waits for the connecting service. As noted above, participants were averse to transfers when they added a lot of time to the overall trip or forced them to travel out of direction (as in the case of traveling downtown before connecting to a route taking them back out).

Many participants in community-hosted conversations emphasized that while they share an appreciation for reducing the number of stops to speed up service, the specific stop locations are very important. They stressed the need to maintain stop locations that serve important destinations like public housing, senior housing, medical institutions, childcare, and grocery stores. The hardship of walking long distances and waiting during weather events, or while juggling groceries or children was mentioned frequently.





"I would love to see bus stops at every other block, or every 3rd block, rather than every block. For a minimal additional walk, I think this would speed up the routes."

"Residents are often comfortable riding the light rail, but not the bus because of misunderstandings about routes and schedules. It would increase ridership among the community."

"It's understood that the express buses and routes like the C Line stop less frequently, but they need to make sure that stops are close to high-rises, as well as grocery stores, medical facilities, libraries and shopping centers."

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Make investments to improve reliability of service

In many of the community-hosted conversations, there was a great deal of feedback regarding on-time performance and the desire to see better reliability. Participants identified late buses, missed trips, and unreliable service as a major problem.

Discussions centered around other improvements, including frequency, span, and coverage often identified poor reliability and late buses as one of the key issues supporting the need for other improvements. For example, some participants identified frequent service as insurance against late or missing buses.



"I think the frequency of the bus need to be prioritized, for the areas I live, the bus is every hour, if I miss one bus, I have to wait for another hour to catch the bus. Also, if a bus was late and it was so later. Then the next bus arrived at the same time. Timely arrival of the buses, frequency of the buses."

Improve connections to key destinations in suburban areas

Survey respondents in suburban areas were more likely to prioritize improved coverage, reducing walk distances, and minimizing transfers than respondents overall. In community-hosted conversations, participants identified poor pedestrian infrastructure and long distances from bus stops to destinations as major barriers to using transit. In these areas, access to key destinations was identified as more important than improved frequency.



"I had a horrible time one day. I had to go to Amazon out in Shakopee. To do the application process and my interview. This is Shakopee. I had the most horrible time ever. I had to walk so far just to get to somewhere."





Service Distribution

Prioritize improved local service over specialized rush hour express service

Most participants focused on the need to improve existing local service, and survey respondents prioritized improvements to frequency on local routes over additional rush hour service into downtowns. Within express service, participants emphasized the need for more service beyond the typical peak periods with longer span of service, greater frequency, and service on weekends.



"I live in Coon Rapids, even though I have a bus stop right out of my home, the bus only run six times per day, three times in the morning, and three times in the evening. And there is one direction, three times in the morning going towards to downtown Minneapolis, but only three times in the evening coming out to Coon Rapids. If you really want to have a daily trip to downtimes, you have to arrange your schedule based on the bus schedule."

Generally, focus on improving service where people are more likely to ride the bus

Most community-hosted conversation participants emphasized focusing resources on prioritizing improvements to existing bus service. Conversations around coverage often centered around making trips that were technically possible on the transit network today easier and faster to complete, rather than access to new areas. Survey respondents also prioritized improvements to areas where people are riding the bus more often.

However, an important exception that emerged in community-hosted conversations was expanding transit service from urban areas to suburban job destinations. Jobs outside of the existing bus network were identified as a barrier to using transit more often.



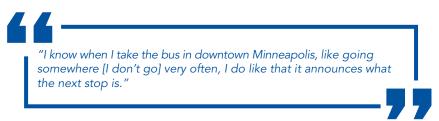
ADDITIONAL FEEDBACK

In addition to the feedback on the network design decisions and tradeoffs, participants in the community-hosted conversations identified and discussed other desired improvements. Those topics are summarized below.

Transit Information, Service Interruptions and Detours

Participants cited an opportunity for more education on bus service and how to find trip information. Many commented that they had never heard of certain tools, such as "find my bus." There was a great deal of enthusiasm for NexTrip real-time information signage and a desire to see more throughout the system. Non-English speakers and those with little or no computer literacy identified finding transit information as a challenge, especially during service interruptions and detours. Participants advocated for more accessible information at bus stops and onboard vehicles, including using Metro Transit staff like bus operators and ambassadors to communicate about disruptions.

Detours and service interruptions were cited as particularly problematic in general, and as a specific source of difficulty when paired with the lack of accurate transit information.



Bus Stops and Accessibility

Participants desired more waiting shelters with heat, light, and benches in most engagements. Participants discussed the need for shelters particularly during inclement weather. Comments indicated that the lack of a covered waiting space was a significant deterrent to using transit.

Participants also shared concerns regarding cleanliness and snow maintenance at bus stops. The lack of snow removal at stops was highlighted as an accessibility issue.

Improved accessibility for seniors and people with disabilities was mentioned quite frequently in community conversations, and from customers during direct outreach.



Safety and the Customer Experience

Concerns regarding personal security and overall perceptions of public safety were discussed in nearly every engagement. Comments included issues with customer behavior, smoking on vehicles and in transit spaces, harassment and police interactions. Concerns regarding unsheltered people, and other vulnerable populations such as those suffering from mental illness or substance abuse were also mentioned. Concerns regarding harassment were raised in the community conversations that focused on youth.



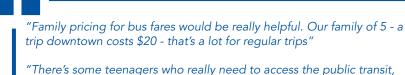
Pedestrian safety and the need for better infrastructure for all modes of transit was also identified as an area for improvement. Participants shared their perspectives on the desire for better signage near light rail tracks and barriers to protect pedestrians and cars.

Comments related to improving customer experience touched on vehicle size and cleanliness and interactions with operators.



Fares

The cost of fares, ease of use of fare tools, and fare enforcement were discussed in many engagements. Participants discussed a desire to see more discounts for families and youth. Many were not familiar with the Transit Assistance Program and were educated during engagements. Discussion of fare enforcement and off-board payment concerns were also highlighted topics.



but can't afford to be pay for school lunches, let alone get on the train to pay for. So I think we addressed that by offering resources to families that have those type of problems."



NEXT STEPS

The themes identified in this Community Engagement Summary inform the development of the Network Next Principles and Guiding Framework. While the development of the Network Next Guiding Framework and the Local and Express Bus Network are postponed until more information is known about the COVID-19 pandemic and its impact on the bus network, work on the arterial Bus Rapid Transit network will continue.

A draft arterial BRT Network will be available for public comment in Fall 2020.

We anticipate work on the Local and Express Bus Network will begin in early 2021.

A complete draft of the Network Next plan will be available for public comment upon the completion of the Local and Express Bus Network. The plan will be modified based on the feedback received and then presented to the Metropolitan Council for approval.

