

SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
1	N/A - General Comment	Mndot's policies, practices, and agreements which shift almost all of the burden for pedestrian facilities onto the locals are not consistent with the policies and vision for this plan. It is hypocritical for MnDOT to continue to take credit for being promoters of pad and bike facilities while they shift all burdens for providing them including liability onto the locals. In fact, such policies and practices are impediments to Ted and bike visions that MnDOT says they have but does not practice what they preach. This needs to change!	Organization	Transportation Options	None	No changes made. The SMTP is not just a MnDOT plan, it is for all agencies with a role in implementing transportation.
2	Chapter 1 - Focus Areas: "Climate: Minnesota's climate is already changing. Temperatures are increasing and larger, more frequent extreme weather events are occurring year round. Climate change will impact the way the transportation system is used, built, designed, operated and maintained. The transportation sector needs to combat climate change by providing people with choices to ensure their daily transportation needs are met."	Thank you for including climate change as a focus area, however the emphasis is not nearly strong enough. Shifting away from new road building and highway expansion to creating a system which reduces vehicle miles travelled should be at the core of MnDOT's planning.	Content	Climate, Land Use	None	No changes made. VMT is included in the SMTP Work Plan. Additional target setting could be included in that effort to continue to emphasize reduction of VMT in MnDOT's planning processes. This is beyond the scope of the 2022 SMTP and will be developed in collaboration with transportation partners around Minnesota.
3	Chapter 5 - Table 5-2: <225 by 2025 Decreasing to 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. There are shorter term targets that help benchmark progress towards 0. The key being continually decreasing fatalities year after year.
4	Chapter 5 - Table 5-2: <980 by 2025 Decreasing to 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. There are shorter term targets that help benchmark progress towards 0. The key being continually decreasing serious injuries year after year.
5	Chapter 5 - Table 5-2: Decreasing to 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. The key being continually decreasing pedestrians killed and serious injuries year after year.
6	Chapter 5 - Table 5-2: Decreasing to 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. The key being continually decreasing bicyclists killed year after year.
7	Chapter 5 - Table 5-2: 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. The key being continually decreasing aviation fatalities year after year.
8	Chapter 5 - Table 5-2: 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. The key being continually decreasing rail derailments year after year.
9	Chapter 5 - Table 5-2: 0	Although commendable, "decreasing to 0" is not attainable or realistic.	Content	Safety	None	No changes made. Decreasing to 0 is a long term target to aspire towards. The key being continually decreasing rail grade crossing fatalities and serious injuries year after year.
10	Chapter 5 - Table 5-5: Vehicle Miles Traveled	The target or desired direction illustrated is commendable and definitely a great strategy, however, historic VMT trends bring into serious question if this is attainable, particularly with transit ridership currently down around 50 percent due to COVID.	Content	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction.
11	Chapter 5 - Table 5-5: Critical Connections Performance Measures: 10,263 (-4%) by 2025	Are these reduction goals for interstates and major roadways or local roadways?	Wording	Climate, Transportation Options	None	No changes made. This is for all roadways. MnDOT will play a partner role in the effort to reduce overall VMT traveled across Minnesota per capita. MnDOT will continue to work with transportation partners around the state to decrease VMT.
12	Chapter 1 - Goals for Transportation in Minnesota: "To provide for and prioritize funding of transportation investments that ensures that the state's transportation infrastructure is maintained in a state of good repair."	More emphasis also needs to be given to greater Minnesota to provide better roads and improvements out state and not just the greater metro area.	Content	Equity	None	No changes made. This language is directly from Minnesota State Statute 174.01. The SMTP policy direction is flexible for people to apply the strategies and actions in different ways across communities. Some strategies and actions could have more impact in rural settings. These include efforts to reduce fatal and serious injury crashes on Minnesota roads and at rail crossings, improving broadband access, collaborating with transportation providers to improve transit services and encouraging communities to implement policies to increase transportation choices.
13	Chapter 1 - SMTP Update Process, Step 3. Next Steps "This work is expected to happen over the next five to 20 years after the plan is adopted, and focuses on the implementation of the policy direction set forward in Chapter 5. Chapter 6 contains the list of activities MnDOT will do in the next five years, known as the SMTP Work Plan. Additionally, each of the Family of Plans will be updated to align with the SMTP policy direction. Chapter 7 identifies partner roles, change readiness considerations and implementation essential practices to move Minnesota's transportation system forward."	More input from counties and local citizen groups or transportation advocates should be sought.	Content	Engagement	None	No changes made. There is content in Chapter 5 background section encouraging engagement early and often.
14	Chapter 1 - Focus Areas - "Aging infrastructure: Infrastructure across the country is aging. As the system ages, more resources go to maintenance and repairs to make sure they serve communities as intended. Minnesota's transportation system shows signs of deterioration and requires attention."	While addressing ageing roads attention should be to address minimal or no adequate shouldering such as on Highway 169 north of Aitkin.	Content	Safety	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" design which will improve safety for all people traveling by any mode. Additionally, the 2022 SMTP includes Transportation Safety action 1.1 "Implement more forgiving road design to mitigate the severity of crashes and the resulting injuries." Added Safe System as a key outcome for Health in the Executive Summary. The SMTP does not list specific projects.
15	Chapter 4 - Public Engagement. "Transportation has a large impact on people, the environment and the economy. People have a right and deserve to be involved in decisions that impact their lives. Accordingly, public engagement was an essential part of the update to the SMTP. The transportation system exists to meet the needs of the people and businesses in Minnesota. It is important to understand what those needs are and use that information to guide decision making. It is also important that everyone is able to participate and be heard."	Highway advocacy groups like the Highway 14 coalition should be used to help show local support for highway improvements.	Content	Engagement	None	No changes made. The policy direction outlined in the SMTP will be done in collaboration with the public, stakeholders and partners across the state.
16	Chapter 2 - Figure 2-17 (link is for Figure 2-16; comment references a map)	This is a beautifully done map with excellent information surrounding it. Very helpful to my overall knowledge and answering questions.	Content	Engagement, Land Use, Transportation Options	None	No changes made.
17	Chapter 2 - Figure 2-11	Beautiful color scheme and so helpful to know what we're working on for myself as a cyclist! Thank you MNDot!!	Content	Engagement, Implementation, Transportation Options	None	No changes made.
18	Chapter 1 - Goals for Transportation in Minnesota: "To provide a reasonable travel time for commuters."	This needs to include all forms of transportation, not just cars.	Content	Equity, Transportation Options	None	No changes made. This language is directly from Minnesota State Statute 174.01.
19	Chapter 1 - Goals for Transportation in Minnesota: "To increase use of transit as a percentage of all trips statewide by giving highest priority to the transportation modes with the greatest people-moving capacity and lowest long-term economic and environmental cost."	This is great to see! Transit can accomplish many of these goals.	Content	Environment, Equity, Transportation Options	None	No changes made.
20	Chapter 1 - Goals for Transportation in Minnesota: "To provide a reasonable travel time for commuters."	This too vague and has often been the reason or justification for bad projects that ultimately go against many of the other goals and increases VMT. I don't think it should be the responsibility of the State to make it quick and easy to commute to downtown from the outer suburbs/exurbs.	Content	Transportation Options	None	No changes made. This language is directly from Minnesota State Statute 174.01.
21	Chapter 5 - Table 5-5 VMT Measure	I appreciate this strategy and wish it were an even bigger focus in the plan. I believe the targets should be more ambitious.	Target	Transportation Options	None	No changes made. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide.
22	Chapter 5 - Table 5-5 Traveler Delay - <9 minutes per weekday	This should be higher!	Target	Other	None	No changes made. Performance measures can be explored in further detail through subsequent modal and system plans.

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23	Chapter 5 - Table 5-5 Job Accessibility by Bicycle, Car and Transit	I think something about frequency of transit should be incorporated into the plan. One place it could go is changing this metric to say, "accessible by frequent transit."	Target	Transportation Options	None	No changes made. This is more about transit access than frequency. Frequency is different depending on where you are located in the state. MnDOT is limited by current data availability. In the SMTMP Work Plan, MnDOT is working on developing metrics to measure transit access statewide to help address gaps in access for all.
24	Chapter 3 - Chapter 3	No comment included	N/A	Not applicable	None	Not applicable.
25	Chapter 2 - Traffic Safety "From 2016 to 2020, approximately 48 pedestrians and eight bicyclists were killed each year. Fatalities and serious injuries involving bicyclists and pedestrians remain largely unchanged. For example, in 2015 there were 41 pedestrian and 10 bicyclist fatalities compared to 55 pedestrian and 9 bicyclist fatalities according to preliminary 2021 crash data."	Could we elevate discussion and tracking of motorcycle crashes? In 2020, there were more motorcycle fatalities than bikes and peds combined. It seems like an important component in reducing crashes, and it would be helpful to highlight all vulnerable road users in safety data and metrics.	Content	Safety	None	No changes made. We do include motorcycles as a mode in the 2022 SMTMP. Motorcycles are considered a part of motorized passenger vehicles and are most commonly used form of transportation in the state. Transportation Safety focuses on reducing fatalities and serious injuries for all modes.
26	Chapter 2 - Table 5-2 Transportation Safety Performance Measures	Could we elevate discussion and tracking of motorcycle crashes? In 2020, there were more motorcycle fatalities than bikes and peds combined. It seems like an important component in reducing crashes, and it would be helpful to highlight all vulnerable road users in safety data and metrics.	Target	Safety	None	No changes made. Motorcycles are considered a motorized passenger vehicle and are included in the total fatalities and serious injuries performance measures.
27	Chapter 5 - Modes and Users of the Transportation System	This whole set of descriptions needs a copy edit!	Typos	Not applicable	SMTMP Items to Edit	Staff completed an additional round of copy editing.
28	Chapter 2 - Figure 2-7: Existing and Tier 1 planned managed lane corridors	These all would be much better suited as bus lanes for true BRT, particularly 35-W and 77 which already have fake BRT.	Content	Climate, Environment, Equity, Land Use, Transportation Options	None	No changes made. Figure 2-7 depicts existing and planned managed lane corridors in the metro area as of 2022.
29	Chapter 2 - Public Transit: "A variety of public transit options are available in the seven-county metro area. Current options include regular and express bus routes, light rail transit, commuter rail and bus rapid transit —these are collectively known as fixed route services. Dial-a-ride service is also available throughout the region. All 188 communities in the Twin Cities have access to some form of public transit service. Transit use has remained steady between 2010 and 2019 according to Metropolitan Council's Travel Behavior Inventory Household Survey results. Of those who use transit, 7% use transit weekly and 44% only use transit when attending an event."	What counts as "having service" here? Because I know of quite a few towns/cities that don't have any	Content	Equity, Transportation Options	None	No changes made. This text is in reference to the seven-county metro area. MnDOT does not have authority over the metro transit system. In the SMTMP Work Plan, MnDOT will develop metrics to measure transit access statewide to help address gaps in access for all.
30	Chapter 2 - Figure 2-13: Greater Minnesota transit service	Again, what counts as a county "having service"? Is it actually usable?	Content	Equity, Transportation Options	None	No changes made. In the SMTMP Work Plan, MnDOT is working on developing metrics to measure transit access statewide to help address gaps in access for all.
31	Chapter 5 - Table 5-5: Critical Connections Performance Measures: Vehicle Miles Traveled Target	Good to see VMT reduction is a target and not a goal. Are there a list of strategies to meet this target. Increasing transit use and bike ped use will have some impact but increasing teleworking and high speed internet connections will likely have a bigger impact. It is also important to realize this target does not work everywhere in the state. It is also important that we do not use this target to eliminate investment in mobility projects. The majority of mobility projects improve safety and reduce emissions by reducing congestions. Another strategy may be to encourage alternate work schedules (4-10s etc.) to reduce work trips etc.	Target	Climate, Transportation Options	None	No changes made. VMT is included in SMTMP Work Plan. VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. This is beyond the scope of the SMTMP at this time.
32	Chapter 6 Work Plan - Transportation Options: "Increase the availability and accessibility of safe and affordable transportation options, including more lower emission transportation options. Provide community engagement and education needed to maximize the return on infrastructure investment. Work with multijurisdictional partners to understand how increasing transportation options meet SMTMP commitments. Related objectives: Open Decision Making, System Stewardship, Climate Action, Critical Connections, Healthy Equitable Communities"	It is important for the environment to move towards increased travel by electric vehicles. The plan, however, needs to discuss the problem of reduced gas taxes needed to pay for the infrastructure needs. There should be a goal of capturing taxes on all vehicle users. This is an equity issue as well. Electric vehicles are more expensive to purchase. If there is not a shift to other forms of revenue, it will leave the burden to lower-income persons still utilizing gas powered vehicles to pay for infrastructure used by all.	Content	Climate, Equity, Funding	None	No changes made. The 2022 SMTMP does establish a new performance measure of 100% of new light-duty vehicles sold in Minnesota that are zero emission by 2040. The SMTMP is a policy plan and does not need to be fiscally constrained. No decisions have been made regarding taxes or equity concerns related to electric vehicles, this is out of scope for the 2022 SMTMP.
33	Chapter 4 Focus Areas - Transportation Options: "The more people drive, the more vehicles there are on the road. More vehicles mean more congestion. Measuring delay can help a region understand congestion and its impacts. Delay per person controls for population growth and helps to understand efficiency and reliability on highways. MnDOT collaborated with the Metropolitan Council on the Twin Cities Highway Mobility Needs Analysis to develop a target of 9 minutes per person per day (equivalent to 40 hours per year). Overall, the transportation system needs a range of solutions including travel demand management, active transportation investment, land use changes and vehicle miles traveled (VMT) reduction to meet the target."	Delay per person measurement does not actually help us understand reliability of travel time. A more complex analysis would be required. In fact, consistent delay can lead to very reliable travel. This is an important distinction because of the interaction with VMT and safety in the Twin Cities area (i.e. less delay, although it has positives, tends to increase VMT and speed in the short term and long term through the land use changes it can incentivize). Better measures would focus more on travel time (both minimizing and making it reliable) than on maintaining speed.	Target	Climate, Environment, Land Use, Safety	None	No changes made. Delay per person is recommended as the performance measure for Twin Cities highway mobility since it can be measured, forecasted, is broadly understood, and controls for population growth. By using these measures in combination with other targets like VMT, it will help inform a number of decisions in transportation including operations, air quality, accessibility for active transportation options and more.
34	Chapter 5 - Table 5-5: Critical Connections Performance Measures: Traveler Delay	Traveler delay measurement should be dropped because it does not give as clear of feedback as other measures, such as travel time reliability and VMT. In some contexts, increased traveler delay can actually be desirable as a consequence of more compact land use. Conversely, decreased traveler delay can have undesirable impacts such as decreased safety and incentivization of inefficient land use (alongside positive impacts). Use other performance measures instead and delete this one.	Target	Environment, Land Use, Safety	None	No changes made. Delay per person is recommended as the performance measure for Twin Cities highway mobility since it can be measured, forecasted, is broadly understood, and controls for population growth. By using these measures in combination with other targets like VMT, it will help inform a number of decisions in transportation including operations, air quality, accessibility for active transportation options and more.
35	N/A - General Comment	Is there a way to provide input about roads being planned that are not what people want but rather what a city deems they want b/c they can get funding for it. I live in Steele County, and the city is pushing a road through that is not what residents want, poses safety hazards, and doesn't accomplish the goals they're claiming. The city claims to have millions lined up in federal funding and as a tax payer wanted to share what's really happening. I just don't know how to do so or reach the appropriate people.	Organization	Engagement	None	No changes made. There is content in Chapter 5 background section encouraging engagement early and often for all transportation partners. As this is a statewide plan and local roads are not MnDOT's jurisdiction, it is out of scope for SMTMP. This feedback will be shared with MnDOT and Metropolitan Council staff involved in highway mobility work.
36	Chapter 2 - Figure 2-2: Total Vehicle Miles Traveled in Minnesota, 2000-2020	Anecdotal, the COVID pandemic brought to light that it is possible to substantially cut down VMT of passenger vehicles, though the heavy commercial vehicle VMT appeared to have increased during the same time period. The SMTMP does not seem to make any distinctions between AADT/HCAADT and their respective impacts; i.e. people obtain goods either by driving themselves or having them delivered, the vast majority of products are produced outside of MN and the final miles of transport is almost entirely performed by heavy commercial vehicles, etc. This would seem to be relevant given the increased damage to roadways heavy commercial vehicles cause relative to passenger vehicles, higher CO2 output per mile traveled, and the present void of zero emission vehicles used to make deliveries.	Target	Climate, Equity, Transportation Options	None	No changes made. There is content in Chapter 5 background section encouraging engagement early and often for all transportation partners. As this is a statewide plan and local roads are not MnDOT's jurisdiction, it is out of scope for SMTMP. This feedback will be shared with MnDOT and Metropolitan Council staff involved in highway mobility work.

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37	Chapter 2 - Figure 2-4: Percentage of Minnesota State Highway Pavement in Poor Condition, 2021	It should be noted that RQJ is derived from a subjective test of 32 random public citizens last performed in 1997. With improvements to vehicles in the last 25 years, would it be more appropriate to bring this key decision making metric into the 21st century? <a href="https://www.dot.state.mn.us/materials/pvmtmgmtdocs/Rating_Overview_State_2015V.pdf">https://www.dot.state.mn.us/materials/pvmtmgmtdocs/Rating_Overview_State_2015V.pdf</a> While a bit tongue-and-cheek, couldn't MnDOT also achieve substantial improvements to the system rating by running a new study based on 32 individuals with particularly low standards riding in brand new luxury vehicles? This quip shows the dangers of systems planning based on small sample sizes (32 people), utilizing old data (likely derived from a mid 90's era Ford Taurus), and a single vehicle type (especially in light of the goal to decrease overall VMT, which will result in a higher percentage of heavy commercial vehicles as part of overall VMT).	Content	Engagement, Equity, Implementation, Safety, Transportation Options	None	No changes made. Targets and performance measures are often based on the best available information we have. In Chapter 5, the 2022 SMTP does commit to disaggregating data where and when possible. Specifically, recreating the pavement condition rating procedure is out of scope of the 2022 SMTP.
38	Chapter 2 - Figure 2-6: Traffic Facilities on Minnesota Roads, 2010 to 2021	Addressing systemic safety issues should remain a priority in transportation system planning; though MnDOT has some notable recent failures. I.E. The merger of 94/494/694 in Maple Grove, where 2 lanes from 696 merge with 2 lanes from 494 into 3 lanes on 94. This recent project failed to eliminate the high speed WB merge that results in chronic slowdowns and likely a high number of accidents. I.E. MnDOT's reliance on short term fixes (mill and overlays) requires construction more frequently on high volume roadways. This increases the likelihood of work zone accidents as well. I.E. The general lack of timely preventative maintenance produces higher impact projects down the road. Many pavements do not receive timely preventative maintenance, so an inexpensive repair today may be quite expensive in 2 years given that roadway deterioration tends to be exponential.	Content	Engagement, Equity, Implementation, Safety	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" design which will improve safety for all people traveling by any mode. Additionally, the 2022 SMTP includes Transportation Safety action 1.1 "Implement more forgiving road design to mitigate the severity of crashes and the resulting injuries." Also, using Safe System was added as a key outcome for Health in the Executive Summary. The SMTP does not list specific projects.
39	Chapter 2 - Highway Reliability and Congestion: "Both delays and congestion can be measured in the amount of time and fuel wasted, cost to travelers or reductions in access to destinations within a given amount of time. MnDOT keeps detailed data on motor vehicle congestion for the Twin Cities and collects and analyzes travel time reliability data for Greater Minnesota. Currently, MnDOT measures motor vehicle congestion in the metro area based on travel speed during peak periods which can be seen in Figure 2-10."	Despite having this data, MnDOT does not presently factor in user costs (user delays, excess fuel consumption, etc.) into its existing pavement Life Cycle Cost Analysis process. The commissioner recently testified against inclusion of such items, and most shockingly against the excess fuel consumption language. Factoring in all of these user costs would likely result in substantial savings to taxpayers, and substantial decreases in transportation related CO2.	Content	Climate, Environment, Equity, Implementation	None	No changes made. MnDOT keeps detailed data on motor vehicle congestion for the Twin Cities and collects and analyzes travel time reliability data for Greater Minnesota. Currently, MnDOT measures motor vehicle congestion in the metro area based on travel speed during peak periods. In Chapter 5-Critical Connections, there is an action that calls for leveraging travel demand management strategies as part of comprehensive congestion management planning. Additionally, the 2022 SMTP includes the new proposed VMT target, which will also help monitor the efficiency of the system.
40	Chapter 2 - Highway Reliability and Congestion: "MnDOT defines freeway congestion as traffic flowing at speeds less than or equal to 45 miles per hour. Freeway congestion levels in the metro area have remained relatively constant since 2010, with a little more than 20-25% of freeway miles congested during peak travel periods. The metro area freeway system had a marginal increase in the percentage of miles of freeway congested, from 24.2% in 2018 to 24.4% in 2019. The COVID-19 pandemic stay-at-home order decreased congestion by 30-50% initially and it remains at a 15-20% decrease. In 2020, only 1.4% of freeways miles were operating below 45 miles per hour during peak periods. Although congestion is currently projected to increase in the coming years."	The PDF version of the SMTP includes a quote that is missing from the SMTP plan that is visible for comments. This missing quote is "... I usually need to get to work at a specific time each day and just from a logistical standpoint I cannot really afford to introduce any variables into my morning commute." To this person's point: The public cannot afford to have as many construction projects each year as the status quo. Longer life fixes reduce the total number of lane miles needing construction/maintenance each year. I.E. If all pavements were constructed to 50 year design lives in lieu of 25 year design lives, half as many miles would require construction each year. This would save substantial resources and greatly reduce variables in daily commutes.	Content	Engagement, Equity, Implementation	None	No changes made. 2022 SMTP includes an action to System Stewardship Strategy 1: Maximize the useful life of transportation assets while considering performance, costs and impacts to people, the environment and our economy.
41	Chapter 3 - Environment: "Minnesota's transportation sector is also contributing to climate change. Since 2016, transportation has been the largest contributor to greenhouse gas emissions in the state. Climate change impacts from high temperatures, large storms and more will impact transportation. Transportation practices need to change to reduce the sector's contribution to climate change and to ensure the system can adapt to and mitigate the impacts of extreme temperatures and weather."	The urban heat island effect is a significant factor as well, and can be substantially reduced with lighter/more reflective pavements.	Content	Climate, Environment, Equity and Implementation	None	No changes made. In the 2022 SMTP Chapter 5, urban heat islands is included in green infrastructure in System Stewardship and in the extreme temperature action in Climate Action. Also, developing resources to mitigate urban heat islands is included in the SMTP Work Plan in Chapter 6. Consideration of urban heat islands is new to the 2022 SMTP.
42	Chapter 4 - Climate Change: "A combination of statewide policy solutions, like those in this SMTP, and local actions are needed to connect the goals of climate action with the tangible choices people have available to them. The future of transportation and climate change requires more coordination across jurisdictions and disciplines. Transportation will need to make a shift to default to climate-friendly options such as using modes that don't depend on fossil fuels and building in ways that reduce impact on the environment. This shift will require the transportation system to look, feel, operate and be maintained differently in the coming decades."	MnDOT's commissioner recently testified against including excess fuel consumption factors as part of a bill to update pavement Life Cycle Cost Analysis legislation: "MnDOT is currently starting to explore the excess fuel consumption. It is premature to require these considerations prior to knowing how it could impact our program." Why is it premature to consider pavement type selections' impact on the environment? This paragraph and the commissioner's statements are in direct opposition.	Content	Climate, Environment, Implementation	None	No changes made. The 2022 SMTP encourages a shift to default to climate-friendly options, such as building in ways that reduce impacts to the environment. The shift will take time and the SMTP lays the groundwork for policy change over the next twenty years. Additionally, specific pavement type selections is outside of the 2022 SMTP scope.
43	Chapter 4 - Economy and Employment: "Changes in the manufacturing sector may necessitate easier access to air cargo facilities to ship smaller, high value goods. On-demand shipping will continue to change the way that people think about delivery and courier services, and the way that those services use the transportation system. Freight movement was changing before the pandemic. But COVID-19 accelerated the trend toward customized deliveries for individual consumers. Freight destinations used to be focused on hubs and businesses, but now have expanded to include individual homes. Any place with an address can now be served as a freight destination."	These trends show that higher heavy commercial vehicle trips are growing throughout the transportation network. This shows the need for more robust & long-life pavement designs throughout the pavement network. It would seem appropriate to include the goal of constructing long-life and resilient projects as part of the SMTP.	Content	Climate, Environment, Implementation	None	No changes made. In Chapter 5, the Critical Connections objective has a strategy and supporting actions that commit to ensuring efficient, affordable, reliable and safe movement of goods throughout the state. This includes defining priority networks, improving connectivity, addressing freight bottlenecks and using technology for system optimization. Additionally, in the System Stewardship objective there is strategies that address managing assets which includes data, software and research that help improve materials and practices to maximize the useful life of an asset.
44	Chapter 6 Work Plan - Climate Action and Public Health: "Leverage MnDOT right-of-way to reduce carbon emissions. There is a growing list of ways transportation right-of-way can be used to reduce carbon emissions such as carbon capture and storage, clean energy utilities, active transportation and more. Expand on MnDOT's NextGen Highways work. Related objectives: System Stewardship, Climate Action, Healthy Equitable Communities."	Does MnDOT plan to install rooftop solar on facilities? This would be a great way to lead on carbon emissions with a relatively low cost investment. MnDOT should lead by example, and the first way is for MnDOT to set the goal of generating 100% of the electricity used by the agency from renewable resources within 10 years.	Content	Climate, Environment, Implementation	None	No changes made. MnDOT has installed solar panels on the ABC Ramps in downtown Minneapolis, and has researched the feasibility of capturing solar energy using snow fences. MnDOT is exploring how solar energy development on the right-of-way will help meet MnDOT energy needs, reduce long-term operational costs and limit greenhouse gas emissions.
45	Chapter 6 Work Plan - Climate Action and Public Health: "Develop resources to mitigate urban heat islands. Document understanding of how extreme heat affects Minnesota, what populations are most directly affected and how people are impacted for the long term. Recommend and implement strategies to reduce urban heat islands. Related objectives: System Stewardship, Climate Action, Healthy Equitable Communities"	The use of light colored pavements is the primary way MnDOT can accomplish this. Transitioning to 100% concrete pavements in urban areas would be sound policy to address urban heat islands. A description & supporting document link to how MnDOT currently considers urban heat island effects in transportation planning would be beneficial here as well.	Content	Climate, Environment, Equity, Implementation, Land Use	None	No changes made. This is out of scope of 2022 SMTP. In the SMTP Work Plan, MnDOT is committing to developing tools and guidance to mitigate urban heat islands, which includes developing specific recommendations and strategies to reduce urban heat islands. Consideration of urban heat islands is new to the 2022 SMTP. In the SMTP Work Plan, MnDOT commitments to exploring a range of options to mitigate and minimize urban heat islands. This could include and will likely extend beyond considering pavement only.

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46	Chapter 6 Work Plan - Planning, Policy and Guidance: "Update MnDOT technical guidance to incorporate new practices and policy direction. MnDOT is responsible for a variety of technical guidance that influences how projects are developed and impact communities in Minnesota. It is important that these documents are updated periodically to reflect new research, innovation and policy direction. Guidance should address changes needed to meet SMTP targets for VMT reduction, GHG reduction, multimodal accessibility and transportation safety. Related objectives: Open Decision Making, Transportation Safety, System Stewardship, Climate Action, Critical Connections, Healthy Equitable Communities"	MnDOT can encourage cities and counties to consider reducing overall lifecycle costs/resources/CO2. This could be encouraged via grants or mandates to receive State Aid.	Content	Climate, Environment, Implementation	None	No changes made. This work plan item is intended to encourage communities to incorporate new practices and policy through our plans and technical guidance. MnDOT will continue to provide guidance and encourage changes that are needed to meet the Minnesota State Statute 174.01 and the performance measures included in the 2022 SMTP. In general, the chapter 6 serves as the MnDOT-specific work plan and does not extend to other jurisdictions. However, other agencies can consider implementing their own work and activities in alignment with the SMTP Work Plan items.
47	Chapter 5 - Table 5-1: Open Decision Making Performance Measure: "Public Trust and Confidence - Annual percent of respondents that agree with the following statements"	MnDOT's pavement Life Cycle Cost Analysis compliance was audited by the Office of the Legislative Auditor in 2014, and the agency effectively ignored the recommendations made. MnDOT's engineers are not trained in financial decision making by education nor internal MnDOT training. Improvements are obviously needed as evidenced by the current condition rating of 64%.	Target	Implementation	None	No changes made. The 2022 SMTP has included a performance measure to increase public trust and confidence from the current condition to over 80% overall and for each demographic segment.
48	Chapter 5 - Open Decision Making, Strategy 5: "Use research and data to drive decision making in pursuit of local, regional, Tribal, statewide and national goals."	The National Center for Asphalt Technology (NCAT) conducted a literature review (NCAT Report 14-07). Within the report, Table 17 describes the effect of pavement type of pavement-vehicle interaction, showing on the whole that rigid pavements are more fuel efficient. MnDOT's commissioner testified against inclusion of excess fuel consumption in the pavement Life Cycle Cost Analysis bill in spite of the plethora of available research showing fuel economy difference between pavement types, and in spite of transportation CO2 reduction being a critical goal. It's nice to see that the draft plan would include direction to include these considerations in the decision making process going forward, which is a welcome change to the current status quo.	Content	Climate, Environment, Implementation	None	No changes made.
49	Chapter 5 - Transportation Safety, Strategy 4: "Prioritize safety for people and communities through the safe movement of goods. Invest to increase safe and reliable routing for hazardous, oversized and overweight material transport. Increase availability and accessibility of safe and reliable freight truck parking. Invest in safety improvements to roads, sidewalks, bicycle lanes and trails that cross railroads and freight routes, including the installation of gates and warning signs."	Many rest areas have insufficient parking for commercial vehicles, and frequently this spills over to the connecting ramps/shoulders. Some are so full on the interstate, that truckers are parking overnight on the ramps of nearby interchanges. Considering these needs, as committed to here, shows MnDOT is making strides to improve a historical blind spot for MnDOT. I only hope concrete action actually follows.	Content	Implementation, Land Use, Safety	None	No changes made. Additionally, the System Stewardship objective includes a performance measure that monitors rest area conditions, which is new to the 2022 SMTP. Also, chapter 6 includes a work plan item to explore more options for safe and reliable truck parking.
50	Chapter 5 - System Stewardship, Strategy 1: "Maximize the useful life of transportation assets while considering performance, costs and impacts to people, the environment and our economy. Incorporate asset management principles in capital, maintenance and operations decisions. Ensure capital planning processes prioritize preventive maintenance. Review planned maintenance and reconstruction projects to identify cost-effective opportunities to improve safety, manage congestion and improve transportation options. Minimize environmental impacts and lower lifecycle costs through the reuse of materials and use of innovative new materials and techniques. Use performance-based planning and data to inform the location and timing for project improvements."	Can you provide a link to how MnDOT manages the use of natural resources during road construction planning, such as topsoil, aggregate, water, gasoline/diesel, etc.? Adding considerations for natural resource management would be prudent as well.	Content	Climate, Environment, Implementation, Land Use	None	No changes made. In Chapter 5, the System Stewardship has a strategy and five supporting actions dedicated to preserving and improving Minnesota's natural resources and minimizing harm to the environment. Different practices are used for each project to respond to local conditions. Explore MnDOT's Office of Environmental Stewardship webpage for more information.
51	Chapter 5 - System Stewardship, Strategy 4: "Preserve and improve Minnesota's natural resources and minimize harm to the environment. Promote pollinator habitat, native plantings and trees within transportation right-of-way. Integrate green infrastructure practices into transportation projects and facilities. Improve water quality through the development and use of innovative stormwater management strategies. Implement practices that reduce chloride use during winter maintenance. Research, develop and implement measures to preserve habitats near the transportation system, protect wildlife and limit the spread of invasive species."	This portion of the plan is missing a critical component, and that is minimizing the use of natural materials such as rock, sand, and fuels when making transportation decisions. In practice, many of MnDOT's road construction projects use excessive amounts of natural resources for base material (sand, rock, etc.), frequently above and beyond what is required in accepted engineering design practices. These resources should be considered as well, especially in light of development that effectively restricts access to vast amounts of potential construction materials.	Content	Environment, Implementation, Land Use	None	No changes made. Specific construction materials and design practices are out of scope of the 2022 SMTP. The SMTP encourages MnDOT and transportation partners to consider new environmental quality techniques, maintenance activities and alternative site design practices to preserve the state's valuable natural resources while reducing harm. Considerations for which materials to use have to be balanced with environmental needs, project goals, costs, etc., and are determined on a project-by-project basis.
52	Chapter 5 - Climate Action, Reducing Emissions: "Reducing emissions from the transportation sector will create healthier and more livable communities. Minnesota's transportation sector is the largest contributor to greenhouse gas emissions—the most significant cause of climate change—in the state. This objective focuses on tailpipe emissions as this presents a significant near-term opportunity to curb GHG emissions. Lower emissions modes of travel (such as walking, rolling, bicycling and taking transit), electric vehicles, alternative fuels and innovative technologies and solutions can help reduce GHG emissions."	Noting first that fuel use is the primary user cost when the public drives on the road; MnDOT's current commissioner testified against considering excess fuel consumption as part of MnDOT's pavement Life Cycle Cost Analysis process. The current process ignores all critical factors influencing fuel consumption, and MnDOT testified against factoring fuel usage in the decision making process. CO2 savings of 2-6% could be made by having smoother & more rigid pavements; it's abhorrent that these considerations are not made in the planning process. It's clear that MnDOT speaks out of both sides of it's mouth on CO2 reductions. I can only hope that the direction proposed in this plan is implemented, it would be a welcomed change.	Content	Climate, Environment, Implementation	None	No changes made. The 2022 SMTP is committed to enhancing transportation options and technology to reduce greenhouse gas emissions. Key commitments include reducing emissions, coordinating with communities and building resiliency.
53	Chapter 5 - Table 5-4: Climate Action Performance Measures: "Greenhouse Gas Emissions Total annual greenhouse gas emissions from the transportation sector (percentages shown in parenthesis reflect percent reduction from 2005) 40.3 million metric tons CO2e (2018) 29.5 million metric tons CO2e (30%) by 2025 20.1 million metric tons CO2e (50%) by 2030 14.1 million metric tons CO2e (65%) by 2035 8.0 million metric tons CO2e (80%) by 2040 Lead"	Reducing excess fuel consumption by having smoother & more rigid pavements can achieve 2-6% reduction in transportation sector CO2 emissions. This correlates to a similar percentage of range gains in electric vehicles; thereby reducing one of the principal factors against purchasing an EV. Taking steps to eliminate excess fuel consumption could be implemented by MnDOT to help achieve these goals.	Target	Climate, Environment, Implementation	None	No changes made. Specific pavement type selections is outside of the 2022 SMTP scope. Other performance measures, like vehicle miles traveled target and walking and bicycling target, encourage mode shifts that will result in a reduction of fuel consumption.
54	Chapter 5 - Climate Action, "Strategies"	The commissioner should reevaluate past legislative testimony and actions in light of the language here, and then fully support the proposed pavement Life Cycle Cost Analysis bill with inclusion of excess fuel consumption calculation language. Excess energy consumption is important regardless of energy source (fossil fuels/renewables). <a href="https://www.revisor.mn.gov/bills/text.php?number=SF3133&amp;version=late&amp;session_year=2022&amp;session_number=0">https://www.revisor.mn.gov/bills/text.php?number=SF3133&amp;version=late&amp;session_year=2022&amp;session_number=0</a>	Content	Climate, Environment, Implementation	None	No changes made. The Life Cycle Cost Analysis bill is outside of the 2022 SMTP scope.

SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response	
55	Chapter 3 - Critical Connections, Strategy 2:	"Ensure efficient, affordable, reliable and safe movement of goods throughout the state. Define priority networks and integrate the networks into decision making based on connectivity and access to destinations. Add new and improve existing first- and last-mile connections for better freight access to the transportation system. Address freight bottlenecks in the transportation system. Use technology for system optimization for all modes."	A good policy is to not ignore bottlenecks when you're reconstructing the road. I.E. The recent 94/494/694 WB merger failed to address this bottle neck. 2 lanes both of 494 & 94/694 merge into 3 lanes of 94. This high speed merger is unsafe, creates a bottleneck on a critical corridor, and could have easily been corrected as part of the recent project completed. Adding an additional lane for 1-2 miles would have solved this for a marginal project cost increase. The I-94 corridor projects between Maple Grove and Clearwater created many other bottlenecks along the way which are not resolved. Managing this segment according to a corridor plan would have been more prudent.	N/A	Engagement, Equity, Implementation, Safety	None	No changes made. In Chapter 5, there is a System Stewardship action that commits to review planned maintenance and reconstruction projects to identify cost-effective opportunities to improve safety, manage congestion and improve transportation options. Specific projects are outside the scope of the SMTP.
56	Chapter 1 - Goals for Transportation in Minnesota:	"Minnesota statutes identify 16 goals to ensure Minnesota's has an integrated multimodal transportation system. The 16 goals are:"	Organizing the goals below with icons/images (if possible) will improve readability.	Design	Format	None	No changes made. The goals are listed in same order as they are in state statute.
57	Executive Summary - "What is different from the previous SMTP"	Highlighting the changes from the prior plan is really helpful, this improves both readability and utility for people who have to refer to this plan frequently.	Content	Format	None	No changes made. Glad this change makes it easier for you to understand the information.	
58	Chapter 2 - Vehicle Miles Traveled, Figure 2-2: Total vehicle miles traveled in Minnesota, 2000-2020	Is this appropriate information to include given the anomaly of 2020, and recovering VMT since 2020 dip? This graphic has limited content value since ongoing VMT recovery in 2021. Should include 2021 data if possible.	Content	Not applicable	SMTP items to edit	The intent was to provide data that we have for the past twenty years. Language describes the uniqueness of 2020 and what has been happening since then. Additionally, this is the best available data at the time of the 2022 SMTP development. For final 2022 SMTP, staff will include 2021 data if available.	
59	Chapter 2 - Vehicle Miles Traveled: "Minnesota's roadway network has changed over time to meet the needs of those who use it. From 1992 to 2018, VMT growth on all roads in Minnesota averaged about 1.4% per year. From 2000 to 2019, overall statewide total VMT rose approximately 16.5%, from 52.1 billion VMT to 60.7 billion VMT. However, statewide VMT saw a slight reduction by 1% from 2018 to 2019 per capita. Due to the COVID-19 pandemic, 2020 saw an unprecedented drop in VMT throughout the state. In the early months of the pandemic, the volume of vehicles on Minnesota roadways dropped in some areas by 30% to 50%. This drop in VMT is shown in Figure 2-2."	Same comment as below - writing up VMT trends with 2020 as end point (and expected VMT recovery in 2021-22) has little value.	Content	Not applicable	SMTP items to edit	The intent was to provide data that we have for the past twenty years. This is the best available data at the time of the 2022 SMTP development. For final 2022 SMTP, staff will include 2021 data if available.	
60	Chapter 3 - "Environment" section	I would argue that the Environment topic area should be advanced above economy due to the pressing issue and severity of climate change, and transportation's impact/contribution to climate change.	Content	Environment	None	No changes made. Different people have different opinions on the importance of topics. Accordingly, topics have been listed in alphabetical order to not presume importance.	
61	Chapter 1 - Goals for Transportation in Minnesota: "To provide a reasonable travel time for commuters."	"Commuters" should be inclusive of people taking transit, walking, or biking to work. "Reasonable" in this context assumes this is to mitigate congestion for drivers.	Content	Not applicable	None	No changes made. This language is directly from Minnesota State Statute 174.01.	
62	Chapter 1 - Goals for Transportation in Minnesota	Missing from these goals is a goal to reduce the amount of driving Minnesota residents, businesses, and Indigenous Nation members do for their trips.	Content	Not applicable	None	No changes made. This language is directly from Minnesota State Statute 174.01.	
63	Chapter 2 - Highway Reliability and Congestion: "Since 2013, the reliability of Minnesota's interstate system has remained relatively consistent at both the statewide and Twin Cities area levels (see Figure 2-8 and Figure 2-9). The statewide Interstate reliability measures tend to be higher (more reliable) than the metro measures since the metro area tends to experience higher traffic volumes and congestion levels. For most of the years between 2017-2020, the Interstate has been less reliable compared to NHS for both the statewide and Twin Cities areas. Due to the COVID-19 pandemic, reliability was considerably better since fewer people were traveling and there was rarely congestion."	There's all this focus on highway/road reliability and congestion for drivers, but no recognition of these same factors for transit users. The state should be measuring and evaluating transit reliability/congestion along with drivers.	Content	Congestion	None	No changes made. In Chapter 5, the Critical Connections objective has several performance measures, strategies and actions that are dedicated to transit performance, availability and service.	
64	Chapter 4 - Figure 4-1: Tribal reservations and communities in Minnesota, 2021	I'm happy to see the state explicitly showing the difference between ceded and non-ceded territory on an official map.	Content	Format	None	No changes made.	
65	Chapter 4 - Focus Areas, Aging Infrastructure: "Faced with an extensive, rapidly aging system and increasing construction costs, transportation partners in Minnesota are struggling to keep the system out of poor condition. Poor condition can look like out-of-service transit vehicles, gaps in sidewalks, bridges in need of repair and poor pavement quality. Not only do deficiencies result in rough roads, sidewalks that fail to meet ADA standards, etc., deterioration can also make the system vulnerable to risks from things like climate change and extreme weather."	This doesn't mention possible bridge and dam failures, which are even more important.	Content	Safety	None	No changes made. Failures are very rare. Because of this, data doesn't change on an annual basis. We focus instead on bridge condition, which can inform decision making annual to ensure that failures continue to be rare events. The language does mention bridges in need of repair. In Chapter 5, System Stewardship objective includes performance measure to specifically track bridge conditions statewide. The desired targets include: <ul style="list-style-type: none"> <li>•NHS Poor: ≤5%</li> <li>•Non-NHS Good: ≥50%</li> <li>•Non-NHS Poor: ≤8%</li> </ul>	
66	Chapter 4 - Focus Areas, Transportation Options: "The more people drive, the more vehicles there are on the road. More vehicles mean more congestion. Measuring delay can help a region understand congestion and its impacts. Delay per person controls for population growth and helps to understand efficiency and reliability on highways. MnDOT collaborated with the Metropolitan Council on the Twin Cities Highway Mobility Needs Analysis to develop a target of 9 minutes per person per day (equivalent to 40 hours per year). Overall, the transportation system needs a range of solutions including travel demand management, active transportation investment, land use changes and vehicle miles traveled (VMT) reduction to meet the target."	This congestion measure should be established for other modes of transportation: walking, biking, and transit. Congestion greatly affects people not traveling via car.	Content	Transportation Options	None	No changes made. A congestion performance measure for each mode is currently not possible due to availability of data.	
67	Chapter 5 - Open Decision Making, Strategy 1: "Ensure people have opportunities to play an active and direct role in transportation decision making. Start transportation processes by working with communities to identify strategies that support people's vision, priorities and needs. Determine community demographics for plans, programs and projects and tailor public engagement approach to increase broad community participation and input. Create public engagement plans that clearly articulate decision points, who will be involved at each step of the process and who has authority over each decision. Include those impacted by transportation decisions as members of decision-making teams. Actively engage in community-centered conversations and use community wisdom to inform decision making. Create and implement processes and systems to monitor and evaluate effectiveness in achieving shared outcomes."	Public engagement should clearly note what decisions have already been made PRIOR to coming to the first public meeting.	Content	Engagement	None	No changes made. In Open Decision Making, strategy 2 encourages to regular two-way communication with partners, stakeholders and the public to continuously gather feedback. Additionally, the 2022 SMTP is committed to ensuring transparent and equitable decision making as well as tracking and increasing the public trust and confidence in MnDOT. Further, the action encouraging public engagement plans notes that information should "clearly articulate decision points."	

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ID	Chapter or Appendix	Comment	Type	Category	Action	Response
68	N/A - General Comment	Zipper not to the left lane nor to the right lane. Zipper to a center lane marked by cones and then once it's zippered, then move traffic to the open lane.	General	Not applicable	None	No changes made. There is not enough information on where this relates to in the 2022 SMTP. MnDOT encourages drivers to do the zipper merger and educates people accordingly.
69	N/A - General Comment	I've noticed traveling through the metro area and looking at your site that many of the park and ride lots no longer provide bus service out of them (some are not even listed on your site (Lakeville - 35W and CR 5 for one). Why did we pour all this taxpayer money into these park and ride lots and now they are not used for what they were built for. Seems like a huge waste of taxpayer money.	General	Transportation Options	None	No changes made to SMTP. Staff will work with Metro Transit to respond to commenter.
70	N/A - General Comment	As a commuter, I would like a better listing of ride sharing/public transportation for going long distances with more people than just one per car. Especially with gas prices as they are.	General	Transportation Options	None	No changes made. In the 2022 SMTP Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. This includes providing information about what services are available. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations.
71	Chapter 1 - Goals for Transportation in Minnesota: "To minimize the fatalities and injuries for transportation users throughout the state."	To consider any fatalities acceptable is a blatant violation of ethics and conduct. Roadways should be required to be designed for 0 preventable fatalities or injuries. The moment a serious injury or fatality occurs the road should immediately be redesigned so that the type of injury or death can never occur again.	Content	Safety	None	No changes made. Chapter 1 goals are directly from Minnesota State Statute 174.01. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0. The 2022 SMTP also added Safe System as a key outcome for Health in the Executive Summary.
72	Chapter 1 - Goals for Transportation in Minnesota: "To provide a reasonable travel time for commuters."	This needs defining. What is 'reasonable'? What is reasonable for different modes of transportation? Are you going to prioritize reasonableness for vehicular traffic at the expense of pedestrian traffic? Are you going to make pedestrian/bike infrastructure reasonable - don't forget it snows so those trails are going to need to be cleared just as fast as road lanes if that's the case. Are you going to actually implement the passenger rail section of the State Rail Plan in order to ensure people are not held up for hours due to freight rail? Are you going to increase transit funding for buses and light rail so transit routes can be frequent?	Content	Transportation Options	None	No changes made. This language is from Minnesota State Statute 174.01.
73	Chapter 2 - Bridge Condition: "MnDOT is currently not meeting the state's target for the acceptable percentage of NHS bridges in poor condition. As of 2021, 6% of NHS bridges were in poor condition, which does not meet the NHS state target. Over 4% of Non-NHS bridges were in poor condition, which does meet the Non-NHS state target. 30% of NHS bridges and 31% of Non-NHS bridges were in good condition. As seen in Figure 2-5, the percentage of bridges on the NHS in poor condition exceeded the NHS target of 5% in 2021. This is projected to still exceed the target in 2022 before returning to below the target in 2023. However, the percent of bridges on the NHS in poor condition is projected to again rise above the target in 2026. Note these projections are anticipated to improve as MnDOT expects to use federal funding for bridges as authorized by the Infrastructure Investment and Jobs Act."	Given that MnDOT cannot meet the target for maintenance, MnDOT should not expand any roadways or plan any new roadways until the existing maintenance backlog is resolved. This is poor engineering and planning, budgeting, and unnecessarily and recklessly places Minnesotans lives in danger.	Content	Safety	None	No changes made. The trend for the past decade has been to focus on maintaining and modernizing existing roads and bridges, while strategically completing the network for other modes. This continues to be a priority. The 2022 SMTP commits to maximize the useful life of transportation assets while considering performance, costs and impacts to people, the environment and our economy. Future, Critical Connections strategy 5 says to "Follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. Check out the Minnesota State Highway Investment Plan and provide your input on how MnDOT should prioritize investment over the next 20 years.
74	Chapter 2 - Traffic Safety: "From 2016 to 2020, approximately 48 pedestrians and eight bicyclists were killed each year. Fatalities and serious injuries involving bicyclists and pedestrians remain largely unchanged. For example, in 2015 there were 41 pedestrian and 10 bicyclist fatalities compared to 55 pedestrian and 9 bicyclist fatalities according to preliminary 2021 crash data."	MnDOT should be held responsible for every death and injury that occurs on roadways, given that in Chapter One the goals plan to minimize, not eliminate, deaths and injuries. Furthermore, most roadways are designed with bicyclists and pedestrians as an after thought and as second class citizens. MnDOT must prioritize all roadway projects to be designed for non-motorized safety, comfort, functionality over motorized traffic.	Content	Equity, Safety, Transportation Options	None	No changes made. Chapter 1 goals are from Minnesota State Statute 174.01. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0. 2022 SMTP also added Safe System as a key outcome for Health in the Executive Summary.
75	Chapter 2 - Managed Lanes: "'Managed lanes' are express lanes that use electronic tolls to improve traffic flow, provide alternatives to congestion and improve safety. Managed lanes were first implemented on the Twin Cities' metro area freeway system in 2005 along I-394. Automated toll lanes and other managed lane technologies have since been extended to portions of I-35W and I-35E. These technologies are under consideration for other parts of the metro area. Figure 2-7 shows the existing and planned managed lane corridors in the metro area. Metro area managed lanes are also referred to as E-ZPass and were previously known as MnPASS."	Shut these lanes down and convert into high quality public transportation systems.	Content	Environment, Equity, Land Use, Transportation Options	None	No changes made. Managed lanes are used to improve traffic flow and provide alternatives to congestion and improve safety. In Chapter 5 System Stewardship strategy commits to maximize the useful life of transportation assets while considering performance, costs and impacts to people, the environment and our economy. This includes an action that includes reviewing planned maintenance and reconstruction projects to identify cost-effective opportunities to improve safety, manage congestion and improve transportation options, which would include reviewing projects for opportunities for public transit. Additionally, in Chapter 5, Critical Connections action 1.3 calls for partnerships and investments in high-capacity transit services and transitway corridors where existing and planned land uses justify a high demand for transit services in urban areas.
76	Chapter 2 - Intercity Passenger Rail and Bus Services: "Minnesota has intercity passenger rail and bus service. Amtrak's Empire Builder route offers passenger rail service between Chicago and Seattle, stopping at stations in six Minnesota cities (i.e., Detroit Lakes, Staples, Saint Cloud, Minneapolis-St. Paul, Red Wing and Winona). Round-trip service is expected to be expanded in 2024 with a second daily train from St. Paul to Chicago being added to the existing Amtrak service on the Empire Builder route. Additional corridors are being considered for future passenger rail service."	Intercity passenger rail travel is severely lacking. New service should be prioritized over any new highway expansion. The intercity bus network is far too slow for anyone traveling long distances across the state and represents a failure of MnDOT to consider any mode of transportation other than the private car. Further more, a recent report released by NACTO continues to illustrate that 50%+ of greenhouse gases are released via private automobile trips. Expanding passenger rail for long distance trips with short interconnecting intercity bus trips would rapidly reduce GHG emissions. But MnDOT would rather risk the grid by prioritizing single-occupancy electric vehicles, maintaining the existing status quo, and usher in Urban Renewal 2.0 in the name of environmental sustainability.	Content	Climate, Environment, Equity, Transportation Options	None	No changes made. The 2022 SMTP is committed to enhancing transportation options and technology to reduce greenhouse gas emissions. In Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations.
77	Chapter 5 - Open Decision Making, Strategy 3: "Provide consistent, transparent, fair, just and equitable communication. Partner with the public and stakeholders to identify, develop and implement communication and engagement approaches. Use culturally appropriate communication and engagement methods and techniques. Set plain language and accessibility standards for agency and contractor deliverables and provide training for staff. Provide training for different communication methods including storytelling. Increase staff ability and provide resources to improve engagement for people with disabilities and limited English proficiency."	Transportation planning, especially MnDOT, does not do engagement well. Even if your outreach strategy is sound and outcomes representative, the feedback rarely influences planning and design, especially because of the way cost share happens with cities. It's time to go beyond a marketing campaign and do authentic, real engagement. Everything else is a waste of time and money.	Content	Engagement	None	No changes made. In Open Decision Making, strategy 2 commits to regular two-way communication with partners, stakeholders and the public to continuously gather feedback. Additionally, the 2022 SMTP is committed to ensuring transparent and equitable decision making as well as tracking and increasing the public trust and confidence in MnDOT. With a 20-year planning horizon, the SMTP looks to the future for how we want transportation to change in the coming decades. The information in the plan does not always reflect current conditions or people's experiences today.
78	Chapter 5 - Transportation Safety, Strategy 2: "Modify infrastructure to accommodate all modes of transportation using complete streets, context sensitive and Safe System approaches. Explore opportunities for lower cost solutions that can be deployed quickly. Design roads for appropriate speeds based on land use context and user needs. Design and maintain transportation infrastructure to support current and new technology with proven safety benefits for all users."	MnDOT does not currently have an approach to make this a reality. The state aid design manual does nothing to further these objectives either. The state needs to be a leader in multimodal investments. Repair the previous harms your decisions have made in splitting communities and create a sustainable system that is equitable and climate friendly.	Content	Climate, Equity	None	No changes made. The 2022 SMTP provides a framework for changes to policies, programming and practices over the next twenty years. The plan calls for change to meet social, economic and environmental goals for transportation. Additionally, the 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0. 2022 SMTP also added Safe System as a key outcome for Health in the Executive Summary.

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ID	Chapter or Appendix	Comment	Type	Category	Action	Response
79	Chapter 5 - System Stewardship, Strategy 3: "Plan, design, develop and maintain transportation infrastructure and facilities in a way that reflects and is informed by the surrounding context. 3.1. Prioritize transportation improvements that support existing and compatible planned land uses. 3.2. Right size the transportation system to make the best use of available resources and right-of-way for all modal options. 3.3. Expand opportunities to leverage full value and productivity of existing transportation right-of-way. 3.4. Develop a transportation system that is respectful of cultural resources and maintains those resources for generations to come."	MnDOT maintains one of the largest systems in terms of lane miles per capita. Based on MnSHIP's preliminary estimate of need, we're no where close to meeting our obligations even with the federal cash infusions. The state needs to have a real plan in place to reduce this system to a more manageable level - encourage turnbacks, gravelization, don't do capacity projects. Our system is overbuilt and wasteful.	Content	Other	None	No changes made. The 2022 SMTP System Stewardship action 3.2 encourages agencies to right size the transportation system. Further, Critical Connections action 5.4 calls for implementing lower cost and targeted improvements before considering major expansion.
80	Chapter 5: "Strategies" (assume it is strategies in Climate Action objective)	So long as the state invests in one single capacity project, their approach to climate resilience cannot be taken seriously.	Content	Climate	None	No changes made. The 2022 SMTP provides a framework for changes to policies, programming and practices over the next twenty years. The plan calls for change to meet social, economic and environmental goals for transportation statewide. Any one project is unlikely to meet all of the commitments in the SMTP. Instead, each project must balance a number of considerations to provide the best available solution to meet project goals.
81	Chapter 5 - Critical Connections, Strategy 3: "Provide transportation options to connect people to services, employment, neighborhoods and other destinations. Develop and improve multimodal options including intercity passenger rail and intercity bus within and between cities and regions. Integrate transit with mobility options, shared mobility and micromobility through system improvements like mobility hubs and transit stations. Provide more flexibility in types, spans and frequency of transit service to better connect people with key destinations. Expand and modify the transportation network for safe and convenient options for people to walk, roll, bicycle and take transit."	Transit in greater MN is wholly inadequate. The funding levels do not provide any real transit service to the elders living in these communities far away from medical services and daily needs. The state needs to change their approach to funding rural transit.	Content	Transportation Options	None	No changes made. People need access to jobs, school, food, childcare, health services and other destinations no matter where they live. The 2022 SMTP has made the commitment to maintaining and improving the multimodal transportation connections essential for Minnesota's prosperity and quality of life. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations. Also, the plan calls for strategic considerations of new connections that help meet performance targets and maximize social, economic and environmental benefits.
82	Chapter 1 - Focus Areas: "Climate: Minnesota's climate is already changing. Temperatures are increasing and larger, more frequent extreme weather events are occurring year round. Climate change will impact the way the transportation system is used, built, designed, operated and maintained. The transportation sector needs to combat climate change by providing people with choices to ensure their daily transportation needs are met."	"by providing people with environmentally friendly choices....."	Wording	Climate, Environment	SMTP items to edit	Content edited.
83	Chapter 3 - Environment	Comment regarding chlorides and other pollutants that get into the waterways and pollute the wildlife and drinking sources.	Content	Climate, Environment	None	No change made. In Chapter 5, the System Stewardship has a strategy and five supporting actions dedicated to preserving and improving Minnesota's natural resources and minimizing harm to the environment. The SMTP encourages MnDOT and transportation partners to consider new environmental quality techniques, maintenance activities and alternative site design practices to preserve the state's valuable natural resources while reducing harm. Considerations for which materials to use have to be balanced with environmental needs, project goals, costs, etc., and are determined on a project-by-project basis.
84	N/A - General Comment	I live off of I90. My parent's live off of I90. We are in southeast MN. I am so tired of our ramps being closed randomly with no warning and one being closed all summer. Again. I trust mndot to prioritize what needs to be done as far as work goes. So I don't care about that. But please for the love of God tell us when you are going to close ramps. Even if it's late at night or for one day. I was so sick today and had to drive an extra 20 minutes in misery because the next open ramp was seven miles away. All I could think over and over was f you mndot. I don't think that makes for safe driving 😞	General	Engagement	None	No changes made. In Open Decision Making, strategy 2 encourages to regular two-way communication with partners, stakeholders and the public. Additionally, the 2022 SMTP is committed to ensuring transparent and equitable decision making as well as tracking and increasing the public trust and confidence in MnDOT. Further, the action encouraging public engagement plans notes that information should "clearly articulate decision points" to help increase transparency and open communication.
85	Chapter 1 - Goals for Transportation in Minnesota: "To reduce greenhouse gas emissions from the state's transportation sector."	This should be goal #2 instead of 15. MN, along with the rest of the country, need to face the facts and begin, however difficult, to prioritize greenhouse gas reductions as a near top priority.	Content	Climate	None	No changes made. The goals are listed in same order as they are in Minnesota State Statute 174.01.
86	Chapter 3 - Environment: "Minnesota's transportation sector is also contributing to climate change. Since 2016, transportation has been the largest contributor to greenhouse gas emissions in the state. Climate change impacts from high temperatures, large storms and more will impact transportation. Transportation practices need to change to reduce the sector's contribution to climate change and to ensure the system can adapt to and mitigate the impacts of extreme temperatures and weather."	Instead of "will impact" it should say "is impacting". Climate change is already impacting MN in all the ways you mention, so let's not put it off on the future.	Wording	Climate	SMTP items to edit	Content edited. "Climate change impacts from high temperatures, large storms and more is impacting transportation."
87	Chapter 3 - Technology: "New technologies are constantly transforming the way the transportation system is used, planned, designed, built and maintained. Things like traffic condition monitoring, maps, on-board vehicle monitors and real-time transit information have improved the ability for people and goods to move around Minnesota. Increasingly, communications and technology need to be integrated into the system to ensure transportation can meet its goals like reducing greenhouse gas emissions, improving air quality and supporting economic development."	Vehicle electrification should be mentioned as a primary technology driver in MN's transportation system.	Content	Climate	None	No changes made. In Chapter 5, Climate Action objective is committed to enhancing transportation options and technology (including electric vehicles) to reduce greenhouse gas emissions. Climate Action objective, Strategy 1 is dedicated to transitioning the transportation sector away from dependence on fossil-based fuels. Additionally, two performance measures have been developed (see Table 5-4) that have established targets for both the registration and sale of electric vehicles in Minnesota; ultimately with a goal of 100% of new light-duty vehicles sold in Minnesota are electric or another form of zero emission vehicle by 2040. The use of the term "zero emission" is intentional to allow for and encourage innovative new technologies beyond only electrification to help us meet our emission reduction targets.
88	Chapter 5 - Table 5-3, Pavement Condition Performance Measure: "Pavement Condition Annual percent of state highways with good and poor ride quality Interstate Good: 90.7% Interstate Poor: 0.6% NHS Good: 81.6% NHS Poor: 0.6% Non-NHS Good: 75.1% Non-NHS Poor: 2.4% (2021) Interstate Good: >70% Interstate Poor: <=2% NHS Good: >=65% NHS Poor: <=4% Non-NHS Good: >=60% Non-NHS Poor: <=8% Lead Percent, trend and predicted future"	Should not have a target or desired direction which is lower than the current condition. Do not go backwards.	Target	Implementation	None	No changes made. Pavement conditions are currently better than targets. The pavement condition is dynamic. MnDOT has revised the target for pavements in poor condition from 10% to 8%. MnDOT has recently made long term investments and pavements are in historically good condition. Efforts are underway to determine resource allocation as part of the Minnesota State Highway Investment Plan.
89	Chapter 2 - Figure 2-1: "Figure 2-1: Minnesota's State Highway network, 2022	Looks like US 75 was left out of this map	Map edit	Other	None	US 75 is not part of the National Highway System.
90	Chapter 1 - Focus Areas, Equity: "Equity: Decisions on policy, design and operations in the built environment and transportation system have led to inequities for underserved communities, especially Black, Indigenous and People of Color. Advancing transportation equity requires having a better understanding of how the transportation system, services and decision-making processes help or hinder the lives of people in underserved communities in Minnesota."	How will this be achieved? It's mentioned later on that in order to achieve other goals equity may be impacted negatively. Why? Is that the only way to achieve success? Why does it have to be with equity as a sacrifice?	Content	Equity	None	No changes made. See Chapter 5, Open Decision Making objective that has five strategies and numerous supporting actions that outlines how this would be achieved. The objective, strategies and supporting actions support making equitable transportation decisions through inclusive and collaborative processes that are supported by data and analysis. Additionally, in Chapter 6 2022 SMTP Work Plan includes a list of equity work plan action items MnDOT has committed to in an effort to continue advancing equity in transportation planning.



SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
91	Chapter 1 - Focus Areas, Economy and Employment: "Economy and employment: The transportation system works best when it evolves to meet the needs of people and the changing economy. Understanding these needs helps ensure that people and goods move safely and efficiently throughout Minnesota. The future requires collaborative solutions that support the economy and employment as an essential goal for the transportation system."	What about including access to food? everyone eats and access to food is crucial. I'm curious what assessments around food access have been considered? Working with local health departments on this (SHIP) would be great! Food access is so important and often overlooked.	Content	Other	None	No changes made. In Chapter 5, Healthy Equitable Communities there is a strategy dedicated to leveraging transportation solutions to improve public health. This strategy includes an action that addresses increasing equitable access to healthy, culturally appropriate and sustainable food through transportation options. The 2022 SMTP understands the importance of people needing access to grocery stores, health services, educational opportunities, social activities and more. The transportation system strives to ensure people can reach all destinations safely, reliably and conveniently whatever the reason for travel.
92	N/A - General Comment	The plan references data from the local road and bridge infrastructure as well as MnDOT's "partnership" in those systems. The policies set forth or supported in this plan have the potential to result in additional mandates/burdens on local agencies and the goals, policies, and decisions of local agencies should remain autonomous of the SMTP.	Content	Implementation	None	No changes made. Everyone has a role in implementing the SMTP. For partners with transportation decision-making authority, the SMTP provides a framework for changes to policies, programming and practices to move transportation toward the Minnesota GO Vision. For partners without transportation decision-making authority, the plan serves as a set of recommendations and direction to understand how transportation can be integrated into their work and an opportunity to hold transportation partners accountable. See Chapter 7 for description of partner roles in order for the SMTP to be implemented in coordination with stakeholders and partners statewide.
93	Chapter 6 - General Comment	Chapter 6 contemplates revising the cost participation policy for cooperative construction projects and maintenance responsibilities between MnDOT and locals. Local agencies are already carrying an inordinate burden due to MnDOT's lack of investment. Any changes in cost participation must not shift further financial or maintenance burdens onto local agencies.	Content	Implementation	SMTP items to edit	Added language to work plan item to identify under what circumstances MnDOT should cover a greater share of the project costs.
94	SMTP Focus Areas - Safety	While transportation safety is listed as a focus area in the plan, it is listed 5th as a plan focus area. The safety of our transportation system should not be jeopardized by other goals associated with this plan.	Content	Safety	SMTP items to edit	The order of the objectives has been changed to have Transportation Safety listed first. Focus areas are listed in alphabetical order for the purposes of the plan update process.
95	N/A - General Comment	Statewide investment in our current transportation system is inadequate at all levels and does not meet current needs. It should be clearer in the plan that investment in new and/or emerging transportation modes will not direct funds away from existing and critical roads and bridge infrastructure.	Content	Implementation	SMTP items to edit	A new section has been added to Chapter 7 that addresses the need for sustainable transportation funding.
96	N/A - General Comment	Achieving certain identified goals, such as increases in accessibility to bike/pedestrian/transit infrastructure, cannot come at the expense of the existing road and bridge infrastructure.	Content	Transportation Options	SMTP items to edit	A new section has been added to Chapter 7 that addresses the need for sustainable transportation funding.
97	N/A - General Comment	Transportation agencies, including local agencies have invested significant resources into the current state transportation system. The plan should reflect a commitment to fully maintain these existing systems and recognize the value of prior investments.	Content	Other	None	No changes made. The trend for the past decade has been to focus on maintaining and modernizing existing roads and bridges, while strategically completing the network for other modes. This continues to be a priority. The System Stewardship objective is dedicated to strategically build, maintain, operate and adapt the transportation system based on data, performance and community needs and ensuring effective and efficient use of resources.
98	N/A - General Comment	The goals established for pavement conditions appear to support reductions in existing pavement conditions, which suggests reduced funding for existing pavement preservation is acceptable, and it should not be.	Target	Implementation	None	Pavement conditions are currently better than targets. The pavement condition is dynamic. MnDOT has revised the target for pavements in poor condition from 10% to 8%. MnDOT has recently made long term investments and pavements are in historically good condition. Efforts are underway to determine resource allocation as part of the Minnesota State Highway Investment Plan.
99	N/A - General Comment	The plan utilizes the term "equity" throughout the plan. In most sections, "equity" is focused on racial equity and occasionally income equity. The plan should better recognize that "equity" can be defined in many ways and "geographical equity" should also be a consideration as it pertains to transportation and the state's economy.	Content	Equity	None	No changes made. Transportation equity has been defined through the plan update process. See the definition in the Glossary and Transportation Equity Statement of Commitment in chapter 4.
100	N/A - General Comment	A uniform VMT reduction goal for the state is unrealistic. The consideration of a "per capita" based goal is a step in the right direction, but still falls short of recognizing the interplay with other factors such as access to broadband infrastructure, community and school density, and land use that all vary across the state.	Target	Transportation Options	None	No changes made. A per capita VMT measure provides an understanding of how VMT is changing in relation to population growth. Total VMT obscures differences between communities and the people who live in them. VMT alone does not tell a complete story, but combining VMT per capita with other measures, such as access for walking and biking, electric vehicle access, fatalities and serious injuries, and transit reliability, can provide a more comprehensive way to measure our progress to provide transportation options that support healthy communities. MnDOT will work with partners on implementation strategies that reflect the needs of our communities around the state.
101	Chapter 1 - Goals for Transportation in Minnesota: Goal 9 "To provide for and prioritize funding of transportation investments that ensures that the state's transportation infrastructure is maintained in a state of good repair."	MCEA supports the language in this goal and suggests the SMTP in current form does not adequately address this goal.	Content	Implementation	None	No changes made. The System Stewardship objective is dedicated to strategically build, maintain, operate and adapt the transportation system based on data, performance and community needs and ensuring effective and efficient use of resources.
102	Chapter 5 - Table 5-3, Pavement Condition Performance Measure	The current goals established in Table 5-3 of the plan suggest a target that would allow for significant reductions in the current measured pavement conditions. These targets should be increased to ensure adequate resources are prioritized for maintaining the state's transportation infrastructure in a state of good repair.	Target	Implementation	None	No changes made. Pavement conditions are currently better than targets. The pavement condition is dynamic. MnDOT has revised the target for pavements in poor condition from 10% to 8%. MnDOT has recently made long term investments and pavements are in historically good condition. Efforts are underway to determine resource allocation as part of the Minnesota State Highway Investment Plan.
103	Chapter 5 Climate Action strategies and actions - 2.2 and 2.4 and Healthy Equitable Communities strategies and actions - 1.2, 1.3, 1.4, 2.3, 2.5	The Climate Action Strategies and Actions listed as 2.2 and 2.4, as well as Healthy Equitable Communities Strategies and Actions 1.2, 1.3, 1.4, 2.3 and 2.5, suggest MnDOT should play a role in local land use decisions and development of local climate action plans. These items should be removed or revised to clarify local land use decisions are out of the purview of MnDOT and acknowledge local elected leaders know best what land use is appropriate for their communities.	Content	Land Use	SMTP items to edit	Added Land Use call-out box to chapter 5. Planning for the mutual influence that land use and transportation policies and investments have on each other is critical. The SMTP intent is to recognize this relationship and coordinate transportation and land use planning among transportation partners, stakeholders and the public.
104	Chapter 5 - Table 5-5: Critical Connections Performance Measures	Table 5-5 on page 106 suggests a reasonable target for travel time reliability on the National Highway System could be as low as 80%. MCEA believes this is out of touch with the reality Minnesotans expect and need. This speaks to MnDOT's acceptance to see longer commute times and added congestion. This is not only unacceptable to locals, but also contrary to the goals set for reduction in greenhouse gas emissions. The minimum reliability target on the NHS system should be at least 90%.	Target	Other	SMTP items to edit	Target has been amended 90% for travel time reliability. In Chapter 6 - MnDOT's intent is to expand travel demand management strategies to collaboration with partners. Diversify travel choices, such as route, time of travel and mode. Provide people with effective choices to improve travel accessibility and reliability.
105	Chapter 6 2022 - 2027 Work Plan: Planning, Policy and Guidance - "Revise Cost Participation for cooperative construction projects and maintenance responsibilities between MnDOT and Local Units of Government Policy to incorporate explicit considerations for SMTP commitments including climate, equity and health."	Page 125 lists a plan to revise the cost participation for cooperative construction projects and maintenance responsibilities between MnDOT and locals. Any changes in cost participation should be done in cooperation with local agencies and must not shift further financial or maintenance burdens onto local agencies.	Content	Implementation	SMTP items to edit	Updates will be coordinated with MnDOT's State Aid and Operations staff. Work will be coordinated with partners including local governments.
106	Chapter 6 2022 - 2027 Work Plan: System Stewardship and Operations - "Expand the diversity of MnDOT's contractor pool for more opportunities for women, people with disabilities, Veterans and BIPOC to perform MnDOT work."	This plan should include a requirement for the Office of Civil Rights to perform a detailed audit of each DBE on an annual basis to determine if work is being completed per contract requirements and a feedback loop for general contractors to provide specific feedback on DBE firms. This report should be made public and shared with all contractors and agencies.	Content	Implementation	None	No changes made. MnDOT's DBE program is administered in accordance with state and federal requirements. MnDOT's project staff reviews the performance of every DBE firm that is performing work for credit on the project to ensure the DBE is meeting the Commercially Useful Function requirements of the DBE program. During the construction of the project there is frequent engagement with all parties on the work of the project, including DBE firms, non-DBE firms, the prime contractor, and MnDOT staff. This information is public and is retained by MnDOT's Office of Civil Rights
107	Chapter 6 2022 - 2027 Work Plan: Transportation Safety - "Integrate Safe System approach in transportation safety processes and initiatives."	There are numerous ways to create a safe transportation system, and the safe systems approach may not align with local goals or may create other issues when implemented. Adopting a Safe Systems approach has ripple effects across numerous areas including statutory and regulatory. More thought and discussion with local agencies is necessary before moving toward adoption of Safe Systems.	Content	Safety, Implementation	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" design. The 2022 SMTP added Safe System as a key outcome for the plan. MnDOT's transportation safety partnerships like Minnesota Toward Zero Deaths (TZD) and Safe Routes to School are key to building a culture of safety through a Safe System Approach. In Chapter 6 Work Plan, MnDOT has committed to integrating the Safe System approach in transportation safety processes and initiatives. This includes pursuing a holistic and comprehensive framework to make the transportation system safer for people. Also incorporate considerations of human behavior and human vulnerability into system design and operations. Everyone has a role and responsibility to implement an equitable, Safe System approach.



SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
108	Chapter 2 Bicycling & Walking; "For bicycling and walking, local trips within communities are often more important than long-distance connections. However, there is limited data to report at a local level. At the state level, Minnesota currently has three designated U.S. Bicycle Routes – the Mississippi River Trail, the North Star Route and U.S. Bicycle Route 20. These routes include 1,320 miles of designated bicycle facilities on state and local roads and trails."	What are the trends in bicycling accidents involving severe injury or rise in bike vs. other pedestrian or motor vehicle, as a result of electric bikes, scooters, and boards (one wheels); and how could planning fund more signage/safety on trails by either providing speed limits, local volunteer trail liaisons, or even paid trail monitors on state and regional trails?	Content	Safety	None	No changes made. See Chapter 3 - Safety section for pedestrian and bicycling trends. Scooters and skateboards are included in the bicycle and pedestrian data. Bicycles that have electric assist and motorized bicycles are counted as bicycles (non-motorist category) and are included in the pedestrian and bicycle data. A moped is an example that would be considered a motor vehicle. Transportation safety is a top priority for Minnesota and applies to all people who use the transportation system regardless of their mode of travel. A one size fits all approach does not work for transportation safety. Additionally, the Transportation Safety objective is dedicated to applying proven strategies and actions to reduce fatalities and serious injuries for all modes.
109	N/A - General Comment	I'm listening in as best I can. I live in Ramsey county. I am a senior. I'm asking if senior needs are included in this plan? Very lighted streets. Very large and clear signs. Boulevards for walking if no sidewalks. Clear road markings. I am not sure the state use of Webex is the best process for public comment. I do zoom almost every day so it is not my system or me. I want to make sure that senior needs are incorporated in this plan. We have many seniors walking and driving around MN and we the state need to be ready and prepared. Even if that is just to let other drivers know seniors are on the roads.	Content	Safety	None	No changes made. Generally, 2022 SMTP emphasizes that current decision making processes prioritize people through transportation safety, especially for those most vulnerable. People age 65 and older are included in the Environmental Justice and Title VI analysis included in the appendix. While there are not strategies and actions that focus on seniors. The information throughout the SMTP has been informed by the Environmental Justice and Title VI to ensure the policy direction considers the safety of all users, especially those who are most vulnerable.
110	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. There needs to be robust and reliable public transportation options for people in all regions of the state (i.e., both urban and rural). Please support more plans that would allow people to be less reliant on personal cars.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. The 2022 SMTP is committed to enhancing transportation options and technology to reduce greenhouse gas emissions.
111	N/A - General Comment	The plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. Please also prioritize funding for bike trail maintenance, an issue reporting system, expanded dedicated trails physically separate or, when not feasible, with physical barriers to separate trail users from all vehicle traffic, and provide for safer crossing mechanisms prioritizing bike traffic over vehicle traffic at intersections when crossing roads cannot be avoided. For vehicle control please implement improved traffic signal timing and vehicle wait detection to reduce the time vehicles sit idling waiting for lights to change and continue to replace intersections currently utilizing stop signs and signals with roundabouts.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. The 2022 SMTP is committed to enhancing transportation options and technology to reduce greenhouse gas emissions.
112	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.
113	N/A - General Comment	The Statewide Multimodal Transportation Plan MUST include stronger, science-based goals for shifting trips from driving to other modes!! Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050!! A seven percent VMT reduction will NOT achieve that!! As a Science Teacher/Environmental Educator, former Mechanical Engineer, and a Climate change/Pollution/Human Health/Environmental & Natural World Protections Advocate, I wholeheartedly agree that to fight pollution and climate change, and improve human health and environmental quality, we MUST continue to eliminate our dependence on fossil fuels and prepare for the Renewable Energy and Energy Efficiency Revolutions (which have already started)!!! This MUST include transitioning from gas-powered vehicles to electric vehicles ASAP!!	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. The 2022 SMTP also does establish a new performance measure of 100% of new light-duty vehicles sold in Minnesota that are zero emission by 2040.
114	N/A - General Comment	It is imperative that the plan include strong goals to reduce automobile trips and incentivize transit, walking, and biking. Stop building and expanding new highways to alleviate traffic congestion. Focus on a system that prioritizes zero emission vehicles.	Target	Transportation Options	None	No changes made. Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. Additionally, the 2022 SMTP also does establish a new performance measure of 100% of new light-duty vehicles sold in Minnesota that are zero emission by 2040.
115	N/A - General Comment	Set a science-based VMT reduction target that will achieve net-zero emissions for the Minnesota's transportation by 2050. This is not just what we need to do to ensure a habitable planet. This is also better for using our limited transportation funding efficiently. We must support alternatives, which are less costly for taxpayers to provide, than roads and highways that encourage driving. MN DOT is full of Engineers. Follow the science. Scientific research shows both what the planet needs us to do, and it also shows us how to shift trips from driving to other modes.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.
116	N/A - General Comment	I want new bus rapid transit to run down highway 96 in Shoreview.	Content	Transportation Options	None	No changes made. In Chapter 5, there is a System Stewardship action that commits to review planned maintenance and reconstruction projects to identify cost-effective opportunities to improve safety, manage congestion and improve transportation options. Specific projects are outside the scope of the SMTP.
117	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. The plan should have a heavier focus on alternative transportation methods than cars and highways. Like intercity trains in Minnesota, ways to get to Duluth, St. Cloud, Morehead, Rochester, and Mankato without needing a car. Providing direct bike routes along main transportation corridors should also be more of a priority.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.
118	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.
119	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. This is our state's highest level policy plan for transportation and it has the power to shape the climate and air pollution in our communities for the next 20 years. In Minnesota, we care about clean air, protecting our climate, and connected, thriving communities that work for everyone. To achieve this, MnDOT must lead with a strong, sustainable vision for our future. We need agency decision-makers to make real commitments to reducing driving rates and improving transit, walking, biking, and rolling. I look forward to learning that MnDOT has improved the draft of this plan to keep Minnesota beautiful and pollution-free.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.

SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
120	N/A - General Comment	I am an avid bike commuter, and I appreciate the bike lines that have been built in Minneapolis and Duluth, in particular. I am concerned that this plan does not go quite far enough. The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. I think there are ways to encourage more people to think before they step into their vehicle. For many Americans, it's just reflexive to get in a car every time you have to do an errand. Anything under 2 miles might be achievable by biking or walking for most healthy individuals. Thank you for your work in this opportunity to comment!	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling.
121	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.
122	Chapter 1 - Focus Areas, Safety: "Safety: Recent shifts in transportation behavior have led to a significant step backwards in transportation safety. 2021 was the deadliest year on Minnesota roads in more than a decade. A mix of traditional and new practices and methodologies are needed to prevent and mitigate human error and ensure people are safe."	This section should also address health and promoting healthy options for transportation and prioritizing walkable areas/neighborhoods. Not just car crashes. But also looking at safety at transit platforms and on buses/trains. Only addressing roads is a HUGE lost opportunity for true safety. Not addressing health anywhere is also not good.	Content	Safety	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" design which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, the 2022 SMTP added Safe System as a key outcome for Health in the Executive Summary as well as three other public health commitments. Also reference, Chapter 5 Healthy Equitable Communities objective, where there is a strategy dedicated to leveraging transportation solutions to improve public health.
123	Chapter 1 - Focus Areas, Transportation Options: "Transportation options: A variety of transportation options support how people and goods move across the state, throughout a region or within a community. Collaboration with all partners is required to ensure a connected transportation system offers options and choices for moving people and goods."	walking/accessibility are THE most fundamental ways to travel. accessible pedestrian infrastructure should be a priority - safe routes to school to promote and normalize more walking trips within communities.	Content	Transportation Options	None	No changes made. The 2022 SMTP commits to maximize the useful life of transportation assets while considering performance, costs and impacts to people, the environment and our economy. Also, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. This work is best completed through pedestrian and bicycle planning processes. Active transportation is included in Critical Connections and Healthy Equitable Communities. Also, Climate Action, Critical Connections, and Healthy Equitable Communities objectives include performance measures specifically for bicycling and walking.
124	Chapter 1 - Minnesota GO Vision, Figure 1-1: "Connects Minnesota's primary assets—the people, natural resources and businesses within the state—to each other and to markets and resources outside the state and country."	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that.	Target	Climate, Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.
125	Chapter 1 - Minnesota GO Vision, Figure 1-1: "Provides safe, convenient, efficient and effective movement of people and goods."	provides safe, equitable, convenient, efficient and effective movement of goods.	Wording	Equity	None	No changes made. The language in the SMTP reflects the Minnesota GO Vision as it was developed in 2011. These comments will be shared with staff at which time the Minnesota GO Vision is updated.
126	Chapter 1 - Minnesota GO Vision, Figure 1-1: "Recognizes and respects the importance, significance and context of place—not just as destinations, but also where people live, work, learn, play and access services."	...live, work, learn, and and pray and access services	Wording	Equity	None	No changes made. The language in the SMTP reflects the Minnesota GO Vision as it was developed in 2011. These comments will be shared with staff at which time the Minnesota GO Vision is updated.
127	Chapter 1 - Minnesota GO Vision, Figure 1-1: "Is accessible regardless of socioeconomic status or individual ability."	"regardless of" seems negative and not inclusive - updated the language to accessible to all community members, particularly traditionally underserved populations.	Wording	Equity	None	No changes made. The language in the SMTP reflects the Minnesota GO Vision as it was developed in 2011. These comments will be shared with staff at which time the Minnesota GO Vision is updated.
128	Chapter 1 - Goals for Transportation in Minnesota: "Minnesota statutes identify 16 goals to ensure Minnesota's has an integrated multimodal transportation system. The 16 goals are:"	There is a large gap within the 16 goals listed and the immediate and ongoing need to connect transportation and access to healthy food options within the state. A goal should be 'to connect transit services and routes to every-day destinations'	Content	Climate, Equity, Safety, Transportation Options	None	No changes made. This language is directly from Minnesota State Statute 174.01.
129	Chapter 1 - Goals for Transportation in Minnesota: "To provide transit services to all counties in the state to meet the needs of transit users."	This goal should be redefined - this is an overarching theme but could provide direct support in connecting transit to resident needs if it could be more defined. 'provide transit services to all counties in the state to meet the need of - transit route to health care - transit route to healthy food / food access - transit route to education - transit route that runs during off-hours to provide safe transportation for residences on night-shifts and odd-hour transit times	Content	Equity, Safety, Transportation Options	None	No changes made. This language is directly from Minnesota State Statute 174.01.
130	N/A - General Comment	The Statewide Multimodal Transportation Plan ought to include more robust, science-based goals for shifting trips from driving to other modes. We need to support and encourage modes of transportation that aren't centered on the individual and which do not pollute at the levels of commuter cars. Clean air and water are critical to our survival as a species and to our resilience in the face of climate disaster. Currently a seven percent VMT reduction target is planned, but I urge you to set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. We must do better! Thank you very much for your consideration and thanks in advance for saving lives.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. In Chapter 5, the System Stewardship has a strategy and five supporting actions dedicated to preserving and improving Minnesota's natural resources and minimizing harm to the environment. Explore MnDOT's Office of Environmental Stewardship webpage for more information.
131	Chapter 5 - VMT reduction targets	Our overarching recommendation is that MnDOT strengthen the SMTP's vehicle miles traveled (VMT) reduction targets. If MnDOT significantly reduces VMT over the next 20 years, it will increase transportation safety, increase community health, reduce wear and tear on our system, and reduce CO2e emissions—in short, VMT reduction brings us closer to achieving almost every objective in the SMTP. MnDOT should take two key steps to strengthen the VMT targets.	Target	Transportation Options	None	No changes made.
132	Chapter 5, Critical Connections - VMT reduction targets	First, the VMT targets should move from the Critical Connections section to the Climate Action section. We recognize that reducing VMT relates to critical connections and expanding transportation options—just as it also relates to system stewardship (by reducing wear and tear on the system), healthy equitable communities (by reducing particulate pollution), and so forth. However, the specific metrics for reducing VMT are critically tied to overall climate metrics, which should come as no surprise given that the VMT recommendation originated in MnDOT's climate-focused Sustainable Transportation Advisory Council. Importantly, the draft CO2e reduction goal in the SMTP—of reducing CO2e emissions 80% by 2040—cannot be achieved by achieving 65% zero emission vehicle (ZEV) registration by 2040, the SMTP's ZEV goal. Minnesota must reduce VMT to close this gap.	Target	Transportation Options	None	No changes made. VMT is a measurement used to inform a number of decisions in transportation including operations, air quality, accessibility for active transportation options and more. It is not exclusively tied to reducing greenhouse gas emissions.

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133	Chapter 5, Critical Connections - VMT reduction targets	Second, MnDOT should strengthen the VMT reduction goals to put us on a path to a zero-emission transportation sector by 2050 when combined with credible projections for ZEV adoption. We request that MnDOT conduct analysis sufficient to determine an appropriate VMT reduction rate to hit this climate target. Further, given natural uncertainties about ZEV registration rates twenty years from now, we recommend that the SMTP establish a policy that MnDOT reassess VMT goals every five years to allow the agency to adjust and align those goals with future climate realities. We understand from previous conversations with MnDOT leadership that MnDOT shied away from a bolder VMT target because the agency did not want to commit to a VMT target it did not know it could achieve. Yet MnDOT established an array of Transportation Safety targets that are quite bold, including goals for zero fatalities and serious injuries on our immense road system. We applaud these measures and the aspiration behind them, and we ask that MnDOT staff—through the SMTP goals—take the health of our planet as seriously as they take the health of Minnesotans who live on that planet.	Target	Transportation Options	None	No changes made. Implementation strategies will be developed in collaboration with partners around the state.
134	Chapter 5, Open Decision Making Objective	Add action 3.6 to the Open Decision Making section: "Provide the public with clear information about MnDOT's overarching policy and project goals to help frame community engagement." Community engagement is critical for learning and incorporating input and ideas from those most impacted, and also for building community understanding and buy-in. Yet community members should not be left with the impression that everything is on the table for discussion for every project. Instead, community members should understand the parameters within which MnDOT operates—including statutory agency goals and policies in publicly drafted plans like—and including—the SMTP. Being clear and honest about community engagement processes and parameter will, in the long run, build greater agency/community trust.	Content	Engagement	SMTP items to edit	Added new action to Open Decision Making Strategy 3.
135	Chapter 5, Open Decision Making Objective	Add action 1.6 to the Open Decision Making section: "Use pilot projects as an experiential form of community engagement." Particularly when introducing new infrastructure designs or operations, community members should have the chance to fully understand and experience how those new designs and operations function in their community. These pilots can also serve to reduce fear of change by providing hands-on experiences.	Content	Engagement	None	No changes made. The 2022 SMTP has included a wide-range of pilot opportunities throughout the plan. Examples include, pilot CAV technologies, pilot projects for reducing participation barriers for underserved communities, enhancing public education programs in collaboration with transportation partners, pilot collaborative approaches to develop, attract and retain more BIPOC, people with disabilities and women to the transportation industry, collaborate with partners to pilot and evaluate automated speed enforcement in school and work zones.
136	Chapter 5, Transportation Safety Objective	Add action 1.6 to the Transportation Safety section: "Establish measures to reduce the average passenger vehicle size and weight on Minnesota roads." Larger vehicle sizes result in higher fatality rates for vulnerable road users.	Content	Safety	None	No changes made. Passenger vehicle size didn't come up in conversations throughout the plan update process and would require conversations that are beyond the scope of the SMTP. For example, auto manufacturers determine the size of vehicles produced and MnDOT doesn't have authority over those decisions.
137	Chapter 5, Transportation Safety Objective	Add action 1.7 to the Transportation Safety section: "Implement speed limits that minimize risks to vulnerable road users, including those walking, rolling, and bicycling." Higher speeds are directly correlated with higher fatality rates for those involved in traffic crashes. This action also relates to action 2.2 in the Transportation Safety section.	Content	Safety	None	No changes made. The 2022 SMTP provides a framework for changes to policies, programming and practices over the next twenty years. The plan calls for change to meet social, economic and environmental goals for transportation. Additionally, the 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0. 2022 SMTP also added Safe System as a key outcome for Health in the Executive Summary.
138	Chapter 5, Transportation Safety Objective	Add action 6.5 to the Transportation Safety section: "Establish safety standards for connected and automated vehicles to ensure those vehicles do not create unsafe conditions for those walking, rolling, bicycling, or taking transit." Connected and autonomous vehicles are not safe for vulnerable users just because they are connected and autonomous. In fact, in some instances these vehicles were deliberately programmed to disobey traffic laws. See Associated Press (2022), Tesla Recalls Autos over Software that Allows Them to Roll Through Stop Signs.	Content	Safety	None	No changes made. In Chapter 6 SMTP Work Plan, MnDOT has committed to leading the collaboration with partners, stakeholders and the public to prepare for connected and automated transportation. Building knowledge of connected and automated vehicle (CAV) technology throughout Minnesota so people have the information they need and can help shape the future of transportation. Develop two-way, trusting and lasting relationships with communities, organizations and entities to create a CAV-ready environment in Minnesota and increase confidence in Minnesota's CAV program.
139	Chapter 5, System Stewardship Objective	Add a "Social Cost of Transportation" Performance Measure to the System Stewardship section. This Performance Measure should measure and publicize the total costs—including health, pollution, and other externality costs—of each major transportation mode in the state, including biking, walking, rolling, transit, and car travel. These costs should then be weighed against respective mode shares to calculate a total social cost of transportation across all modes, and the desired direction should be to lower that total social cost.	Content	Equity	None	No changes made. Data limitations would not allow us to produce and track social costs to the extent recommended.
140	Chapter 5, System Stewardship Objective	Amend action 1.3 in the System Stewardship section to read: "Review planned maintenance and reconstruction projects to identify cost-effective opportunities to improve safety, manage congestion reduce VMT, and improve and expand transportation options." Managing congestion is an inappropriate goal for MnDOT unless that congestion relief is explicitly measured over the long-term—thereby avoiding the trap of short-term congestion mitigation inducing demand long-term—and is accompanied by goals to increase overall mobility. Explicitly looking for opportunities to reduce VMT and expand transportation options in every project is critical for MnDOT to reach its full suite of goals.	Content	Transportation Options	None	No changes made. Providing a reasonable travel time for commuters is one of the 16 transportation goals in Minnesota Statutes and requires we work to minimize the time people and goods spend in congestion.
141	Chapter 5, System Stewardship Objective	Add action 1.6 to the System Stewardship section: "Reduce total statewide lane miles." The primary driver of transportation maintenance and capital costs is the size of the system. Minnesota ranks a disproportionate 4th nationwide in total lane miles even though the state is only 12th largest in land area and 22nd largest in population. Further, increased lane mileage induces demand, which in turn results in additional wear and tear on the system.	Content	Other	None	No changes made. The 2022 SMTP System Stewardship action 3.2 encourages agencies to right size the transportation system. Further, Critical Connections action 5.4 calls for implementing lower cost and targeted improvements before considering major expansion. Many of the line miles are outside the state highway system and under the control of counties, cities and townships. These provide critical connections especially in rural communities that rely on single occupant vehicle trips.
142	Chapter 5, Climate Action Objective	Add the following context and information on the introductory page of the Climate Action section: "Importantly, the climate Performance Measures in this section apply to the full statewide system, not individual projects. To achieve these system-wide goals, MnDOT and its partners must exceed system-wide targets on individual projects to account for the fact that not all system assets are updated each year, or even decade.	Content	Climate	None	No changes made. The intent is the work to meet the targets and to reevaluate what changes might be needed when the plan is updated in five years.
143	Chapter 5, Climate Action Objective	We strongly support the inclusion of action 3.1 in Climate Action ("Integrate climate change considerations into transportation decision making..."). To make adequate progress on CO2e emissions reductions, it is critical that the near- and long-term climate change impacts of every project are integrated into every MnDOT decision.	Content	Climate	None	No changes made. In Chapter 5, the System Stewardship has a strategy and five supporting actions dedicated to preserving and improving Minnesota's natural resources and minimizing harm to the environment. Different practices are used for each project to respond to local conditions.
144	Chapter 5, Climate Action Objective	Add action 2.4 to the Climate Action section: "Maximize use of materials with low embodied carbon to reduce the carbon intensity of capital investments." The SMTP Climate Action section heavily focuses on the climate impacts of vehicles on the road. While this is appropriate and critical, the SMTP must recognize the need to reduce the carbon intensity of materials used in building and maintaining Minnesota's transportation system. We note that the Inflation Reduction Act provides significant funding for low-carbon materials.	Content	Climate, Implementation	None	No changes made. Specific construction materials and design practices are out of scope of the 2022 SMTP. The SMTP encourages MnDOT and transportation partners to consider new environmental quality techniques, maintenance activities and alternative site design practices to preserve the state's valuable natural resources while reducing harm. Considerations for which materials to use have to be balanced with environmental needs, project goals, costs, etc., and are determined on a project-by-project basis. In Chapter 5, the System Stewardship has a strategy and five supporting actions dedicated to preserving and improving Minnesota's natural resources and minimizing harm to the environment. Different practices are used for each project to respond to local conditions.
145	Chapter 5, Critical Connections Objective	Establish a "Job Accessibility by Bicycle and Transit Relative to Job Accessibility by Car" Performance Measure in the Critical Connections section. This should measure the percent of jobs accessible by car that are accessible by transit or bicycle in 30 minutes (current condition: 2.2% and 7% respectively) and establish a target of 25% for each mode by 2040. While we appreciate MnDOT's goal to increase job accessibility by all modes, if MnDOT fails to narrow the modal accessibility gap the agency will perpetuate—or even increase—existing inequities. This Performance Measure could also take the place of—or be combined with—the "Increase in Transportation Equity" Performance Measure in the Healthy Equitable Communities section.	Content	Transportation Options	None	No changes made. This option will be explored through the development of the Multimodal Accessibility performance measures as part of SMTP implementation.

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146	Chapter 5, Critical Connections Objective	Establish a "Local Transit Speed Relative to Car Speed" Performance Measure in the Critical Connections section. It should "Measure the speed of local transit trips between destinations relative to car travel speeds." The target should be to achieve local transit speeds no slower than 67% of local car speeds. The attractiveness and utility of transit is driven in large part by the efficiency of the service. Speed—as well as delay and reliability, which are already covered by the draft SMTP—is a critical for this service efficiency.	Content	Transportation Options	None	No changes made. MnDOT is limited by current data availability related to frequency. In the SMTP Work Plan, MnDOT is working on developing metrics to measure transit access statewide to help address gaps in access for all.
147	Chapter 5, Healthy Equitable Communities Objective	Add action 1.6 to the Healthy Equitable Communities section: "Do not increase access to unsustainable sprawling land uses through system expansion." MnDOT is beginning to recognize its role in shaping land use patterns in this draft of the SMTP, and MnDOT should go further and explicitly acknowledge that land uses respond to transportation asset decisions	Content	Land Use	None	No changes made. SMTP is guidance for all transportation agencies statewide. Planning for the mutual influence that land use and transportation policies and investments have on each other is critical. The SMTP intent is to recognize this relationship and coordinate transportation and land use planning among transportation partners, stakeholders and the public.
148	Chapter 1 - Goals for Transportation in Minnesota: "To provide a reasonable travel time for commuters."	This goal should be weighed against the impact of commuters on the communities they drive through. Where I live the city is bisected by two state highways that can only be safely traveled on in a car. They kill pedestrians and make other forms of transportation dangerous and difficult. So yes, reasonable time for commuters but it is unreasonable to expect communities to have a meat grinder running through the middle of their city. Reasonable travel time can be provided by trains and buses that have much less impact on the 'fly-over' communities than single occupancy vehicles.	Content	Equity, Safety, Transportation Options	None	No changes made. This language is directly from Minnesota State Statute 174.01.
149	Chapter 1 - Goals for Transportation in Minnesota: "To provide transit services to all counties in the state to meet the needs of transit users."	It is not enough to provide transit, the transit needs to be high quality. In many ways this goal is used as a bludgeon against poor folks. Everything is structured to favor people with a house and a car; and when a poor person points that out they are told, 'take the bus.' Transit which does not provide high quality transportation is not transit at all. If the bus can't get people to work on time reliably that is not transit. If the bus can't get people to the grocery store in a timely fashion, that is not transit. If people have to spend time dropping their kids off at school that is not transit. So yes, transit everywhere but there should be some minimum standards or this goal is useless/wasted resources.	Content	Equity, Implementation, Transportation Options	None	No changes made. This language is directly from Minnesota State Statute 174.01.
150	Chapter 1 - Focus Areas, Safety: "Safety: Recent shifts in transportation behavior have led to a significant step backwards in transportation safety. 2021 was the deadliest year on Minnesota roads in more than a decade. A mix of traditional and new practices and methodologies are needed to prevent and mitigate human error and ensure people are safe."	Are these recent shifts? The US has had many times worse traffic fatalities than our peer countries for many years. By all means, exploit the latest tragedy but the roads in Minnesota have been very dangerous for a long time.	Content	Safety	None	No changes made. The 2022 SMTP is an update to the 2017 SMTP. Throughout the plan, content has created and updated based on trends that have been happening since the last plan update.
151	Chapter 1 - Focus Areas, Infrastructure: "Aging infrastructure: Infrastructure across the country is aging. As the system ages, more resources go to maintenance and repairs to make sure they serve communities as intended. Minnesota's transportation system shows signs of deterioration and requires attention."	Sunk cost—we need to be prepared to scale down or retire some infrastructure. Where possible transportation should be shifted to more efficient forms of transportation.	Content	Implementation	None	No changes made. The 2022 SMTP System Stewardship action 3.2 encourages agencies to right size the transportation system. Further, Critical Connections action 5.4 calls for implementing lower cost and targeted improvements before considering major expansion. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. Check out the Minnesota State Highway Investment Plan and provide your input on how MnDOT should prioritize investment over the next 20 years.
152	Chapter 2 - Pavement Condition: "Although the roadways rated in poor condition are going down, the percentage of roadways rated in good condition are not increasing at the same rate. This means that more roadways are being categorized as in fair condition. If more roadways aren't moved from fair condition to good condition, the percentage of pavements in poor condition across all roadways is expected to increase in the future. Figure 2.4 shows the percent of roadway miles with a Ride Quality Index less than 2.0 since 2011 and projections for 2021-2024."	We are expanding the roadway network beyond what we can maintain. Stop adding new lanes until the existing lanes are in good condition. Replace existing lanes with dedicated transit lanes to reduce the number of VMT and wear. Build more passenger rail.	Content	Implementation	None	No changes made. The 2022 SMTP System Stewardship action 3.2 encourages agencies to right size the transportation system. Further, Critical Connections action 5.4 calls for implementing lower cost and targeted improvements before considering major expansion. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. Check out the Minnesota State Highway Investment Plan and provide your input on how MnDOT should prioritize investment over the next 20 years.
153	Chapter 2 - Highway Reliability and Congestion: "There are many ways to think about and assess slowdowns on the roadway system. These include measures that analyze traffic delays, travel reliability and traffic congestion when monitoring the performance of the transportation network. The travel reliability is important for the public and freight operators. For individual travelers, reliability may dictate what mode or travel route to use, or it may impact departure times. For freight operators who have to make a freight transfer, an unexpected delay may lead to missed connections or longer travel times."	Consider converting lanes to truck-only. If we converted lanes around the Twin Cities it would allow freight to reliably pass around the metro and individual travelers would be gently encouraged to use transit.	Content	Transportation Options	None	No changes made. In Chapter 5, the Critical Connections objective has a strategy and supporting actions that commit to ensuring efficient, affordable, reliable and safe movement of goods throughout the state. This includes defining priority networks, improving connectivity, addressing freight bottlenecks and using technology for system optimization.
154	Chapter 2 - Intercity Passenger Rail and Bus Services: "Minnesota has intercity passenger rail and bus service. Amtrak's Empire Builder route offers passenger rail service between Chicago and Seattle, stopping at stations in six Minnesota cities (i.e., Detroit Lakes, Staples, Saint Cloud, Minneapolis-St. Paul, Red Wing and Winona). Round-trip service is expected to be expanded in 2024 with a second daily train from St. Paul to Chicago being added to the existing Amtrak service on the Empire Builder route. Additional corridors are being considered for future passenger rail service."	Build a train from the Twin Cities to Duluth.	Content	Transportation Options	None	No changes made. In Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations. The SMTP does not list specific projects.
155	Chapter 6 - Transportation Options: "Work with transportation partners to identify and advance statewide strategies for reducing per capita vehicle miles traveled (VMT) 20% by 2050. Opportunities to reduce vehicle miles traveled vary by geography, community and context. Work with partners to determine where there are the greatest opportunities to meet local travel needs and SMTP targets for VMT, greenhouse gas (GHG) emissions and multimodal accessibility. Develop guidance for regional planning with place-based strategies to reduce per capita VMT. Related objectives: Open Decision Making, System Stewardship, Climate Action, Critical Connections, Healthy Equitable Communities."	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A 20% VMT reduction over the next 28 years will not achieve that.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. The 2022 SMTP also does establish a new performance measure of 100% of new light-duty vehicles sold in Minnesota that are zero emission by 2040.
156	Chapter 2 - Bicycling and Walking: "Additionally, there are more than 4,000 miles of trails for bicycling and walking in the state. Figure 2-11 highlights existing state trails and priority bicycle corridors under consideration for infrastructure improvements and future designation as state bicycle routes. There are also many more off-road infrastructure facilities that support bicycling and walking. Examples of off-road bicycle and pedestrian facilities include bicycle lanes and widened or paved shoulders."	It is not enough to build trails, they need to actually go somewhere. Many of these 4000 miles are fragmented such that if you actually want to walk/roll somewhere you will need to cover significant distances where there is no trail. Many also parallel car routes that bring you to a places where you can't really walk/roll around comfortably.	Content	Transportation Options	None	No changes made. In Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations.

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ID	Chapter or Appendix	Comment	Type	Category	Action	Response
157	Chapter 2 - Seven-County Metro Transit: "A variety of public transit options are available in the seven-county metro area. Current options include regular and express bus routes, light rail transit, commuter rail and bus rapid transit—these are collectively known as fixed route services. Dial-a-ride service is also available throughout the region. All 188 communities in the Twin Cities have access to some form of public transit service. Transit use has remained steady between 2010 and 2019 according to Metropolitan Council's Travel Behavior Inventory Household Survey results. Of those who use transit, 7% use transit weekly and 44% only use transit when attending an event."	I love transit, and I want to love Metro Transit but they are not doing a good job. The machines on the bus can't even make change for small bills. You need to know someone that rides the bus regularly to explain how to pay for a ticket. The first rule of any business is to make it easy for the customer to pay. First be able to take cash, then get fancy with apps and cards and such. Metro Transit would probably collect more fares if they went to a pay-what-you-want model with a collection box. People already get on without paying... On another subject, the entire approach to BRT is wrong. Their implementation of "BRT" is just a bus line with less stops. Yes, I know, people can get on at the back of the bus. Boarding is not the problem, the problem is that they can't even take cash!!! Back to BRT—start the route using existing stations and every year build a couple of the fancy new stations with the curb extensions. Learn as you go and actually get the service started. As it is now it takes years to launch a BRT line which is absurd. It was a real BRT line with dedicated lanes and signal preemption then by all means take a couple years. But Metro Transit's implementation is not real BRT it is just a regular bus with a logical number of stops.	Content	Transportation Options	None	No changes made. The 2022 SMTP is intended to improve transit service over time statewide. In the Critical Connections objective, there is a dedicated action that is about providing more flexibility in types, spans and frequency of transit service to better connect people with key destinations. Additionally, the 2022 SMTP also includes performance measures that monitor job accessibility by transit, transit on-time performance, transit span of service and transit ridership. Staff will collate transit comments received and share them with the appropriate transit agency, like Metro Transit at the end of the public comment period.
158	Chapter 4 - Public Engagement: "Transportation has a large impact on people, the environment and the economy. People have a right and deserve to be involved in decisions that impact their lives. Accordingly, public engagement was an essential part of the update to the SMTP. The transportation system exists to meet the needs of the people and businesses in Minnesota. It is important to understand what those needs are and use that information to guide decision making. It is also important that everyone is able to participate and be heard."	Public engagement is not good actually, I should not have to spend my afternoon going through this plan pointing out simple things like, 1) only build lanes we can afford to maintain, 2) you should be able to pay for the bus with cash, 3) Minnesota roads have been much more dangerous than peer countries for a long time. For the record I am a white dude, so congratulations you just got another white dude's input and the BIPOC folks dying on your highways still haven't commented because they are at work or taking a 2 hour bus ride that would only take 20 minutes on a subway in Madrid. You are certified engineers, do your job. If the public can crowd source this job then please resign immediately. I doubt that public engagement is going anywhere so I will say that I like the ability to comment on specific paragraphs. But in the long run we should have less public engagement not more.	Content	Engagement	None	No changes made. Engagement for the SMTP update focused on connecting with Black, Indigenous and People of Color throughout the development of the plan. For the transportation equity definition alone, over 1,000 people were consulted many of whom identify as BIPOC. Further, the Policy Panel Survey participants were representative of Minnesota's demographics. The information in the SMTP is informed by this robust engagement work that has resulted in over 6,500 participants and over 3,200 responses prior to the public comment period. The public comment period is the fourth in a four-phase approach to connect with Minnesotans for the SMTP.
159	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. Please set a more aggressive VMT reduction target.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division.
160	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. (Also supports MoveMN letter dated September 14 recommendations 1-18)	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Also, see responses to MoveMN letter recommendations 1-18.
161	N/A - General Comment	It is critical that we set a VMT reduction target that achieves our climate obligations. To do otherwise, like only a 7% VMT reduction by 2050, is species suicide. How dumb are we? Our lungs and climate simply cannot tolerate the continuance of egregious ICE operation. And by changing to multi-modal transportation, our bodies and communities will be healthier in so many ways.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. The 2022 SMTP is committed to enhancing transportation options and technology to reduce greenhouse gas emissions.
162	N/A - General Comment	We need operational funding for the Twin City to Chicago TCMC passenger train. The rail office is now closed and just two employees are working with the freight department and doing what they can for passenger rail initiatives. This is unacceptable! We need to have sustained funding for this passenger train and also expand passenger rail service to Duluth and Fargo ND and elsewhere. I am hoping that we can work with Winona State Universities Foundation to put in place a multimodal facility on the property they just purchased with any kind of grant money from the Federal Government, and it would be nice to have the State kick in funds to make this aspiration come true. The property is adjacent to the Winona Amtrak Depot and the University Foundation is amenable to having some of the land for bikes, scooters, rental cars, buses, taxis etc. along with their planned residence hall that would include an eatery for the students and the public, but we could sure use an incentive with a grant to help this along if possible.	Content	Transportation Options	None	No changes made. In Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations. In the SMTP Work Plan, MnDOT will develop metrics to measure transit access statewide to help address gaps in access for all. The SMTP does not list specific projects.
163	N/A - General Comment	Transit for Greater Minnesota is often overlooked by metro voices that are so LOWD they drown out the needs of smaller communities that have needs for tourism, aging seniors, and university students. It would be wonderful if MNDOT could put into their requests for rail funding that the 16-17 Million dollars of rail related property tax revenue could be dedicated to rail related needs in the State rather than all just going into the General Fund. The transfer of these funds could be gradually moved to a dedicated rail fund over time. I think Wisconsin does this and they have over 25 – 30 WisDot rail employees for their rail initiatives. Please keep Greater Minnesota in your vision as we are often overlooked because the population is lower, but the need actually might be much greater because we do not have other alternatives that are provided by private and public support. Big transit in the Twin Cities has a met council or such, but smaller communities do not have the ability to afford this option. Our transit system is primarily small bus route, but we have only Amtrak in one part of the State for intercity service and some bus service to only specific cities and no public air transportation options. Please help provide us better service in Greater Minnesota to public transportation.	Content	Transportation Options	None	No changes made. In Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations. In the SMTP Work Plan, MnDOT will develop metrics to measure transit access statewide to help address gaps in access for all. The SMTP does not list specific projects.
164	N/A - General Comment	If you are serious about instituting multi-modal transportation, you should include Personal Rapid Transit (PRT). As a circulator system apart from ground traffic, PRT is about the only mode that is convenient and safe enough to get people out of their cars. It is also clearly the most environmentally friendly choice.	Content	Transportation Options	None	No changes made. The 2022 SMTP is committed to enhancing transportation options and technology to reduce greenhouse gas emissions. Key commitments include reducing emissions, coordinating with communities and building resiliency. Additionally, new technologies like connected and automated vehicles have the potential to reduce fatalities and injuries and significantly change the way people travel. The SMTP acknowledges that it is important to consider the implications of this technology when planning for the future of transportation. In the SMTP Work Plan, MnDOT has committed to collaborate with partners, stakeholders and the public to prepare for connected and automated transportation.
165	N/A - General Comment	When planning the state's future transportation please include BIG plans for bus/public transportation. That is a good way to reduce pollution.	Content	Transportation Options	None	No changes made. In Chapter 5, the Critical Connections objective has several performance measures, strategies and actions that are dedicated to transit performance, availability and service. In the SMTP Work Plan, MnDOT is working on developing metrics to measure transit access statewide to help address gaps in access for all.

SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
166	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that. Also, please consider that gas prices, the eventual demise of the IC engine, and the high costs of electric automobiles are driving more people to consider alternative electric mobility solutions such as e-bikes, e-scooters, e-trikes, velomobiles, and neighborhood electric vehicles. It is apparent that planners have considered some of the impact of bicycles and e-bikes and e-scooters on Minnesota's transportation infrastructure, but what of the other forms of transportation? Wider-bodies e-trikes and velomobiles will take up a greater width of congested bike lanes, and the electric-assist feature found on most of them brings greater vehicle speeds into the mix as well. I am of the opinion that due to the increasing role that these alternative electric mobility vehicles will begin to play in everyday transportation and commuting, there should also be a commensurate effort to mitigate issues that will arise from the mixing of these "higher-speed" vehicles with the existing pedestrian traffic and legacy bicycle traffic found on Minnesota bike lanes. These mitigating efforts might include widening existing or planned bike paths and including yellow divider stripes to indicate lanes of travel, creating and posting speed/caution/stop signs on bike paths where appropriate for safety, nighttime lighting to ensure good lines-of-sight/enhanced visibility, and of course four-season surface conditioning (snow removal/salting/sweeping) especially on more frequently trafficked bike lanes.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. Also, no decisions have been made regarding equity concerns related to electric vehicles, this is out of scope for the 2022 SMTP. The 2022 SMTP also makes a commitment to building a culture of safety and implementing a "Safe System" design which will improve safety for all people traveling by any mode.
167	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.
168	N/A - General Comment	As someone that has benefited from the auto industry and now retired and now see that we are way too reliant on a personal automobile. time to shift towards mass transit and pedestrian friendly places.	Content	Transportation Options	None	No changes made. In Chapter 5, sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota. Additionally, Critical Connections strategy 3 commits to providing transportation options to connect people to services, employment, neighborhoods and other destinations. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.
169	Chapter 2 - Bicycling and Walking: "Additionally, there are more than 4,000 miles of trails for bicycling and walking in the state. Figure 2-11 highlights existing state trails and priority bicycle corridors under consideration for infrastructure improvements and future designation as state bicycle routes. There are also many more off-road infrastructure facilities that support bicycling and walking. Examples of off-road bicycle and pedestrian facilities include bicycle lanes and widened or paved shoulders."	In addition to manual bicycles, electric-assisted alternative mobility vehicles are becoming popular at an increasing rate as gas prices climbed and electric-powered automobile prices failed to drop. This is going to add a level of congestion to established bike paths/trails that should be planned for in advance. The current market of electric-assisted alternative mobility vehicles include not only e-bikes and e-scooters, but also e-trikes and velomobiles, but also neighborhood electric vehicles. All of these vehicles share some commonalities: they all have electric motors and can maintain a speed of 20mph, and all of them are able to utilize bike paths (saving for NEVs.) I feel that the combination of sustained "high" speeds on the many combined-use pathways in addition to the anticipated greater vehicle traffic that will be using them will likely create future safety issues that should be examined and planned for now, before these safety issues become realized. I encourage city planners/engineers to consider widening "bike" lanes to accommodate wider-bodied vehicles such as the e-trikes and velomobiles, in addition to planning these newer, higher traffic lanes to function similarly to existing automotive lanes of traffic. Four-season road surface maintenance and snow removal, stop signs at intersections of bike lanes/sidewalks, yellow caution signs and reduced speed signs where appropriate, and increased lighting where lines-of-sight call for it would all help to alleviate these future safety risks. "If you build it they will come" truly seems apropos applied to the safety concerns of alternative mobility use in every suburban and urban setting I feel, and I encourage the planners/engineers of our Minnesota DoT to strongly consider how best to meet these needs going forward into Minnesota's electric future.	Content	Environment, Land Use, Safety, Transportation Options	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach. The 2022 SMTP also makes a commitment to building a culture of safety and implementing a "Safe System" design which will improve safety for all people traveling by any mode. Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.
170	Chapter 1 - Focus Areas: "Climate: Minnesota's climate is already changing. Temperatures are increasing and larger, more frequent extreme weather events are occurring year round. Climate change will impact the way the transportation system is used, built, designed, operated and maintained. The transportation sector needs to combat climate change by providing people with choices to ensure their daily transportation needs are met."	Consider elaborating on the "choices" the transportation system needs to provide. People need safe and efficient choices that don't contribute to climate change.	Content	Climate, Transportation Options	None	No changes made. See Chapter 5 - Modes and Users of the Transportation System. This section references all the ways people and goods move around Minnesota. The number of ways people and goods travel continues to change and evolve and now even includes substituting travel for virtual access. Additionally, Climate Action objective commits to enhancing transportation options and technology to reduce greenhouse gas emissions.
171	Chapter 1 - Focus Areas: "Equity: Decisions on policy, design and operations in the built environment and transportation system have led to inequities for underserved communities, especially Black, Indigenous and People of Color. Advancing transportation equity requires having a better understanding of how the transportation system, services and decision-making processes help or hinder the lives of people in underserved communities in Minnesota."	Often BIPOC is "Black, Indigenous, People of Color" without the "and." Consider which version MnDOT wants to use (if you haven't already).	Wording	Equity	None	No changes made. Engagement for the 2022 SMTP update focused on connecting with Black, Indigenous and People of Color throughout the development of the plan. Language is consistent with the MnDOT transportation equity definition that has been informed by feedback from over 1,000 Minnesotans.
172	Chapter 1 - Focus Areas: "Safety: Safety: Recent shifts in transportation behavior have led to a significant step backwards in transportation safety. 2021 was the deadliest year on Minnesota roads in more than a decade. A mix of traditional and new practices and methodologies are needed to prevent and mitigate human error and ensure people are safe."	Consider being more explicit that people driving cars are making poor decisions influenced by highway design and killing others.	Content	Safety	None	No changes made. See Chapter 3 - Safety section that further delves into traffic crash trends including automobile, pedestrian and bicycle incidences and data.
173	Chapter 2 - Table 2-2: Snapshot of Minnesota's transportation system, 2022	Amtrak does not have a "c" in its name. The Empire Builder also goes to Portland and usually is stated as "Chicago-Seattle/Portland."	Wording	Not applicable	SMTP items to edit	Content edited.
174	Chapter 2 - Table 2-2: Snapshot of Minnesota's transportation system, 2022	Scooter companies change year to year. Consider just listing the companies and separately the cities with service.	Wording	Not applicable	SMTP items to edit	Content edited.



SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
175	Chapter 2 - Vehicle Miles Traveled: "Minnesota's roadway network has changed over time to meet the needs of those who use it. From 1992 to 2018, VMT growth on all roads in Minnesota averaged about 1.4% per year. From 2000 to 2019, overall statewide total VMT rose approximately 16.5%, from 52.1 billion VMT to 60.7 billion VMT. However, statewide VMT saw a slight reduction by 1% from 2018 to 2019 per capita. Due to the COVID-19 pandemic, 2020 saw an unprecedented drop in VMT throughout the state. In the early months of the pandemic, the volume of vehicles on Minnesota roadways dropped in some areas by 30% to 50%. This drop in VMT is shown in Figure 2-2."	Consider removing the word "slight" from "a slight reduction by 1%." That's not a slight improvement.	Wording	Not applicable	SMTP items to edit	Content edited.
176	Chapter 2 - Vehicle Miles Traveled: "Minnesota's roadway network has changed over time to meet the needs of those who use it. From 1992 to 2018, VMT growth on all roads in Minnesota averaged about 1.4% per year. From 2000 to 2019, overall statewide total VMT rose approximately 16.5%, from 52.1 billion VMT to 60.7 billion VMT. However, statewide VMT saw a slight reduction by 1% from 2018 to 2019 per capita. Due to the COVID-19 pandemic, 2020 saw an unprecedented drop in VMT throughout the state. In the early months of the pandemic, the volume of vehicles on Minnesota roadways dropped in some areas by 30% to 50%. This drop in VMT is shown in Figure 2-2."	It was motor vehicle traffic that dropped by 30 percent to 50 percent. Bicycle traffic went up (bicycles are vehicles). So the text should specify it was motor vehicle traffic rather than just vehicle traffic.	Wording	Not applicable	SMTP items to edit	Content edited.
177	Chapter 2 - Figure 2-2: Total Vehicle Miles Traveled in Minnesota, 2000-2020	The Y-axis should start at zero. Zooming in so close exaggerates the changes.	Design	Not applicable	SMTP items to edit	Content edited.
178	Chapter 2 - Traffic Safety: "2021 was the deadliest year on Minnesota's roads in over a decade. In total, preliminary reports from the Minnesota Department of Public Safety state that in 2021, 488 people lost their lives due to motor vehicle crashes compared to 394 fatalities in 2020, a 24% increase (Figure 2-6). Note that 2021 numbers are preliminary and are subject to change when the Crash Facts report is published later in 2022. This includes any crash involving a motor vehicle. The number of serious injuries on the roadway system increased from 1,569 in 2020 to 1,722 in 2021. Overall, the total number of serious injuries has generally trended down over the past six years."	Consider "died" rather than the euphemism "lost their lives."	Wording	Not applicable	SMTP items to edit	Content edited.
179	N/A - General Comment	Based on the urgency of climate change and other environmental problems, your draft "Statewide Multimodal Transportation Plan" needs stronger goals. A 7% reduction in "Vehicle Miles Traveled" (VMT) is woefully insufficient for meeting the 2050 carbon reduction targets of zero emissions. Even if the vehicle fleet was completely electrified and that electricity came entirely from non-carbon-burning sources (which isn't going to happen). Roads, asphalt, concrete, bridges and electric cars themselves all require carbon emitting processes to produce. Plastics in a car's body, batteries, tires are all petroleum based. Asphalt requires petroleum. Concrete production alone accounts for over 5% of the world's CO2 emissions. So electrification only marginally reduces carbon emissions. You'll need radical VMT reduction to meet a zero emission target in 27 years-- like a 50% reduction in VMT. Also, you're not even going to get a 7% reduction if you keep building new highways, bridges, highway lanes, off-ramps and other highway infrastructure. You're just making it easier for people to drive and increasing the amount of suburban sprawl and car trips.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. The 2022 SMTP System Stewardship action 3.2 encourages agencies to right size the transportation system. Further, Critical Connections action 5.4 calls for implementing lower cost and targeted improvements before considering major expansion.
180	N/A - General Comment	Every year MnDOT adds nearly 100 lane miles to the state highway system, often at great expense. You just spent 280 Million dollars to widen a few miles of I-494 (between hwy 169 and Mendota Heights) with HOV lanes. Adding new lanes won't reduce VMT, it'll just increase it ...and you're wasting billions of dollars on these expansion projects. So your Plan needs to propose and implement a "State Paving Moratorium"-- a policy of not building new roads or new highway lanes. There should be no expansion of automobile infrastructure. Any funding not being used for basic maintenance should go to public transit and infill housing and business projects that reduce people's need to travel and create the kind of density necessary for public transit to be effective. MnDOT is overwhelmingly an automobile and trucking agency ...and that needs to change if you want to reduce carbon emissions. It starts with amending the state constitution to allow gas taxes and motor vehicle fees to be spent on other transportation and land-use options that lessen the need for driving-- public transit, bicycle, pedestrian, brownfield remediation, urban growth boundaries, and even low-income housing cited near jobs and services, or other measures that reduce travel demand. Your current plan lacks any of that. Stop spouting platitudes about climate change and the environment and get serious!	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. The 2022 SMTP System Stewardship action 3.2 encourages agencies to right size the transportation system. Further, Critical Connections action 5.4 calls for implementing lower cost and targeted improvements before considering major expansion.
181	N/A - General Comment	The watered-down 7% VMT reduction that the Multimodal Transportation Plan draft currently includes is not enough to meet our climate goals nor to improve traffic safety in our communities. We must set an ambitious VMT reduction goal that will allow us to reach net zero carbon emissions in our transportation sector.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. The 2022 SMTP also makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach.
182	N/A - General Comment	The Statewide Multimodal Transportation Plan should include stronger, science-based goals for shifting trips from driving to other modes. Please set a vehicle miles traveled (VMT) reduction target that, when combined with anticipated electrification, achieves our climate obligations of a net zero transportation sector by 2050. A seven percent VMT reduction will not achieve that.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.



SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
183	N/A - General Comment	Thank you for providing a community feedback/suggestion opportunity regarding the new Statewide Multimodal Transportation Plan. Please include a plan to shift more trips from driving to other modes of transportation, for reasons of safety, strengthening our community, and climate action. This desired shift is more likely to become a reality if the SMTP establishes goals that significantly reduce VMTs (more than 7%) on a level that is in sync with the statewide goal of net-zero carbon emissions by 2050. There is so much happening in the world that discourages and disappoints. This is a time for positive leadership and for goal-setting based on science and in the spirit of making effective change and improvements in our community and in the world. It's time to move past fear/cynicism to find and act with courage.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. The 2022 SMTP also makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach. The 2022 SMTP also does establish a new performance measure of 100% of new light-duty vehicles sold in Minnesota that are zero emission by 2040.
184	N/A - General Comment	The ONLY way to significantly reduce the impact of the transportation sector on climate change is to reduce VMT. A reduction of 7% is ludicrous given the severity of the situation. We need to reduce VMT by at least 7% every year for 12 years in order to enhance the natural environment, reduce noise pollution, reduce carbon emissions, and improve the health of plants, animals, and humans.	Target	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Office of Sustainability and Public Health.
185	N/A - General Comment	This email is to request MnDOT lead transportation planning with a strong, sustainable vision for our state's future. It's critically important for MnDOT decision-makers to make real and lasting commitments to reduce driving rates and improve safe, effective, convenient, and reliable access to transit, walking, bicycling, and rolling statewide. To achieve this, please edit the proposed SMTP to create a stronger statewide plan. Too many of Minnesota's transportation plans have NOT focused on providing better and more frequent statewide transit and active transportation to reduce vehicle miles travelled—it's time this MUST change. The proposed SMTP goals begin to address such changes, but they must be a top priority, and in fact must exceed any focus on single-occupancy vehicles—even if those vehicles are electric. MnDOT must take the lead in moving MN to a next-level of goals and actions. The actions must be incorporated into all aspects of MnDOT's work, including areas such as planning and design, funding, and construction. MnDOT must lead within its agency, but must also lead through strong partnerships with all other state agencies, as well as other governmental and private organizations and representatives. We can achieve the MN GO vision only through strong connections and commitments with others. Mn and the world can no longer wait for leadership from others. I support comments mentioned in the Move MN letter to MnDOT. Please take those comments seriously, incorporate them into the SMTP and in project work, and move to truly take MnDOT and MN to a new level. Thank you for any consideration this email receives.	Content	Transportation Options	None	No changes made. The VMT target is a metric to track system operations and other transportation outcomes (e.g. increasing multimodal options) more broadly as well as help inform a number of future transportation decisions. Continual VMT decreases will indicate progress towards the overall target of a VMT reduction. The VMT language as included reflects what was approved by MnDOT's Senior Leadership Team. Chapter 6 makes clear that MnDOT will continue to collaborate with partners on VMT reduction implementation statewide. Additionally, VMT strategies will be developed through a collaborative process led by MnDOT's Sustainability and Public Health division. Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion. This work is best completed through pedestrian and bicycle planning processes. Active transportation is included in Critical Connections and Healthy Equitable Communities. Also, Climate Action, Critical Connections, and Healthy Equitable Communities objectives include performance measures specifically for bicycling and walking. Additionally, the SMTP policy direction outlined in the SMTP will be done in collaboration with the public, stakeholders and partners across the state.
186	Chapter 2 - Traffic Safety: "2021 was the deadliest year on Minnesota's roads in over a decade. In total, preliminary reports from the Minnesota Department of Public Safety state that in 2021, 488 people lost their lives due to motor vehicle crashes compared to 394 fatalities in 2020, a 24% increase (Figure 2-6). Note that 2021 numbers are preliminary and are subject to change when the Crash Facts report is published later in 2022. This includes any crash involving a motor vehicle. The number of serious injuries on the roadway system increased from 1,569 in 2020 to 1,722 in 2021. Overall, the total number of serious injuries has generally trended down over the past six years."	In this use it should be "compared with" rather than "compared to." "Compared with" highlights differences; "compared to" highlights similarities to say one thing is like another.	Wording	Safety	SMTP items to edit	Content edited.
187	Chapter 2 - Traffic Safety: "From 2016 to 2020, approximately 48 pedestrians and eight bicyclists were killed each year. Fatalities and serious injuries involving bicyclists and pedestrians remain largely unchanged. For example, in 2015 there were 41 pedestrian and 10 bicyclist fatalities compared to 55 pedestrian and 9 bicyclist fatalities according to preliminary 2021 crash data."	Consider rephrasing this to something like "about 48 people died walking or using a wheelchair and eight people died while biking on the transportation system."	Wording	Safety	None	No changes made. Original content aligns more closely with the data.
188	Chapter 2 - Bicycling and Walking section	Biking and walking are very different modes with different needs. Consider a separate section for each.	Content	Transportation Options	None	No changes made. Additional information about bicycle and walking trends can be found in the Safety section in Chapter 3. Data for active transportation is limited and would be difficult to create separate sections for each with the current data limitations.
189	Chapter 2 - Bicycling and Walking section: "In 2019, 31% of respondents indicated they either walked or used a wheelchair or mobility device at least a few times per week, while 8% said they bicycled at least a few times per week. During 2020, COVID-19 had a substantial impact on frequency of bicycling and walking trends statewide. Twenty percent of survey respondents indicated they walked or used a wheelchair more due to COVID-19 and 13% of survey respondents indicated they bicycled more due to COVID-19."	If possible, consider using consistent date in 2019 and 2021 rather than how many walked or biked in 2019 vs. how many biked or walked more due to the pandemic in 2021.	Content	Transportation Options	None	No changes made. The data and language was based on what was asked and included in MnDOT's Omnibus Survey.
190	Chapter 2 - Bicycling and Walking section: "Additionally, there are more than 4,000 miles of trails for bicycling and walking in the state. Figure 2-11 highlights existing state trails and priority bicycle corridors under consideration for infrastructure improvements and future designation as state bicycle routes. There are also many more off-road infrastructure facilities that support bicycling and walking. Examples of off-road bicycle and pedestrian facilities include bicycle lanes and widened or paved shoulders."	Bicycle lanes are by definition on-road facilities. Change the example?	Content	Transportation Options	SMTP items to edit	Content edited to read "Examples of <b>on-road</b> bicycle and pedestrian facilities include bicycle lanes and widened or paved shoulders."
191	Chapter 2 - Figure 2-15: Minnesota's existing and planned intercity passenger rail corridors and existing intercity bus network, 2021	The PDF version of this map had the legend text cut off toward the end.	Design	Not applicable	None	No changes made. The Amtrak Line extends off the page to show that the route continues beyond the Minnesota border.
192	Chapter 1 - "What are we trying to achieve"	The PDF version is missing the question mark.	Wording	Not applicable	None	HTML version will match final draft of the SMTP.
193	Chapter 2 - Transportation Funding in Minnesota: "Many partners involved in Minnesota's transportation system provide transportation funding or help decide how money is spent."	Consider more specific information on who those partners are and how they assist.	Wording	Not applicable	None	No changes made. Transportation funding is very complex. The 2022 SMTP includes a whole separate appendix that is completely dedicated to a detailed explanation of Minnesota's funding process. Reference Appendix F for this information.
194	Chapter 3 - Population: "Different communities, including those within relatively small geographies, likely have different transportation needs. Understanding these changing demographic patterns and how they shape travel behavior will help transportation agencies plan future investments that will allow Minnesota to meet its transportation needs and support the people of Minnesota"	Consider removing "likely" from "...within relatively small geographies, likely have different transportation needs." They for sure do.	Wording	Not applicable	SMTP items to edit	Content edited.

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ID	Chapter or Appendix	Comment	Type	Category	Action	Response
195	Chapter 3 - Economy: "The transportation system will also need to adapt to changing urban environments following the COVID-19 pandemic. Even prior to the pandemic, many employers were reinventing workplaces and providing more flexible work environments. Overall demand for office real estate is expected to decrease if remote and hybrid work trends continue. This may be most felt in downtowns, central business districts and suburban office parks. However, downtowns and urban centers are not likely to disappear."	The first sentence might be better stated as "...changing employment environment," as these changes affect rural areas, too. Especially consider remote workers who want to live in exurban and truly rural places and the expectations they'll have for transportation and digital connectivity.	Wording	Not applicable	SMTP items to edit	Content edited.
196	Chapter 3 - Environment: "Rethinking the role of transportation right-of-way can act as a powerful catalyst for the future of transportation, environment and economy. Alternative uses can help accommodate utilities, allow opportunities to increase clean and renewable energy production and provide strategies to revive and maximize the health of the environment. Alternative uses of transportation right-of-way, when implemented properly, provide community benefit, ensure a high quality of life, maximize investments and protect the environment."	Consider reshaping this paragraph to eliminate possible ambiguity with "alternative uses," which for years (and still for some people) meant "walking and biking" rather than driving. Is the intent to mean using the right of way for nontransportation public purposes? Maybe say that and give examples such as carbon sequestration, shading, habitat, etc.	Wording	Not applicable	SMTP items to edit	Content edited.
197	Chapter 3 Technology: "Connected and automated vehicle (CAV) technology especially requires communications and other digital infrastructure to function properly. Connected vehicles can provide information and alerts to drivers and other vehicles to reduce crashes, improve traffic flow and save energy. Highly automated vehicles may not have a steering wheel or a human driver. However, fully "driverless" vehicles are not anticipated to be on streets for many years. Partially automated vehicles are already on Minnesota roads, with companies developing new advancements every day."	Consider hedging the statement "fully "driverless" vehicles are not anticipated to be on streets for many years." There are a few already today. Maybe say "widespread use of fully "driverless" vehicles on our roads is not anticipated for many years."	Wording	Not applicable	SMTP items to edit	Content edited. "However, widespread use of fully "driverless" vehicles are not anticipated to be on streets for many years."
198	Chapter 3 - Safety: "For much of the 20th Century, deaths or serious injuries related to traffic crashes were seen as an unfortunate, but an unavoidable, side effect of the automobile. However, this sentiment is changing. The federal government began enacting requirements for vehicle safety starting in the 1970s. Initiatives like Vision Zero and Minnesota's Toward Zero Deaths program have grown over the previous two decades. U.S. roadways have become safer for people in vehicles. These initiatives contend that even a single death on the nation's roadways is one too many. However, during the COVID-19 pandemic, the trend of reducing traffic deaths reversed as unsafe driving behaviors increased. Minnesota saw 488 deaths on Minnesota roads in 2021, up from 394 deaths in 2020 and 364 in 2019."	"safer for people in vehicles" should be "safer for people in motor vehicles." Bikes are vehicles.	Wording	Not applicable	SMTP items to edit	Content edited.
199	Chapter 3 - Safety: "For much of the 20th Century, deaths or serious injuries related to traffic crashes were seen as an unfortunate, but an unavoidable, side effect of the automobile. However, this sentiment is changing. The federal government began enacting requirements for vehicle safety starting in the 1970s. Initiatives like Vision Zero and Minnesota's Toward Zero Deaths program have grown over the previous two decades. U.S. roadways have become safer for people in vehicles. These initiatives contend that even a single death on the nation's roadways is one too many. However, during the COVID-19 pandemic, the trend of reducing traffic deaths reversed as unsafe driving behaviors increased. Minnesota saw 488 deaths on Minnesota roads in 2021, up from 394 deaths in 2020 and 364 in 2019."	Consider expanding on "unsafe driving behaviors increased." First, it's passive. People were driving those vehicles and making those decisions. What behavior was it? Speeding? Why? Because less traffic on our roads? Distracted driving? Nihilism amid a global pandemic? If we know people drove worse we should say how and what we can do to address it; and not just accept it as an "unfortunate but unavoidable side effect of the automobile."	Wording	Not applicable	None	No changes made. The data does not indicate any one reason for this change. More information can be found in the Transportation Safety trend papers at Minnesota GO.
200	Chapter 3 - Transportation Behavior: "The pandemic also affected walking, rolling and bicycling. Data collected from automated pedestrian and bicyclist counters from 2017 through 2020 showed declines in walking and bicycling from 2017 to 2019. However, numbers rebounded in 2020, but were lower than volumes in 2017. One limitation of these findings is that they reflect volumes at a limited number of specific locations. Also, the volumes do not fully reflect how people are moving throughout a transportation network due to closures, construction projects, daily routines affected by a pandemic or other factors. This limitation can be addressed through additional monitoring which MnDOT is committed to."	Consider more closely connecting this paragraph and the following one. Bike and ped counts usually were focused on commuting demand, which dropped precipitously in the pandemic, but we saw large increases in recreational use, which tended to be more rural or suburban and often uncounted.	Wording	Transportation Options	None	No changes made. The reason for people walking was not specified in the data available.
201	Chapter 4 - Public Engagement in Context: "The impact of transportation on peoples' lives has the potential for vast change. Not all people experience outcomes equitably. For example, the COVID-19 pandemic has disproportionately affected Black, Indigenous and People of color (BIPOC) due to ongoing systemic health and social inequities. These inequities combined with the killing of George Floyd in 2020 and Daunte Wright in 2021 have highlighted the need to focus on racial and social justice."	It's more than health and social inequities. Economic, transportation, housing, education — all of it is intertwined.	Wording	Equity	None	No changes made. No alternative language proposed. See Appendix H for additional content on additional examples of transportation inequities in Minnesota, what transportation equity means to MnDOT and MnDOT's commitment to transportation equity.
202	Chapter 4 - Focus Areas, Climate Change: "Transportation is the largest contributor to greenhouse gas (GHG) emissions—the most significant driver of climate change—in the state. While GHG emissions from the transportation sector have been declining since 2005, Minnesota did not meet the statewide 2015 emissions target. Although continued declines in emissions are projected, they are still projected to be 10 to 15% higher than the 2030 reduction target. While transportation contributes a large percentage of GHG emissions, the sector can also deliver strategies to reduce transportation's impact to the climate. However, bolder action is needed to meet targets to reduce and mitigate GHG emissions."	Consider saying what the percentage of GHG from transportation is rather than only saying it's the largest. It could be 8 percent or 60 percent and in either case be the largest.	Wording	Climate	None	No changes made. Statement is still accurate as the transportation sector is the largest contributor. For specifics, see the Air Quality Trend in the Minnesota GO trend library.

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203	Chapter 4 - Transportation Equity: "MnDOT acknowledges the transportation system and agency decisions have underserved, excluded, harmed and overburdened some communities. We understand some of our past decisions denied Black and Indigenous communities as well as people with disabilities the full participation of transportation benefits. These and other underserved communities have historically carried disproportionate burdens of transportation decisions."	This should be stronger. It's all about the past (Acknowledgment of Past Harms) but the transportation system every day continues to strengthen these inequities. Consider removing "past" from the title and change past tense of "...decisions have underserved, excluded, harmed and overburdened some communities" to "...underserve, exclude harm and overburden Black, Indigenous, disabled..." and other communities you want to acknowledge.	Wording	Equity	None	No changes made. This language is a part of MnDOT's Transportation Equity Statement of Commitment. Staff engaged with over 1,000 people both within MnDOT and with community members and representatives of community-based organizations to provide feedback on the draft definition. This engagement process took over three months. People commented it is important for MnDOT to acknowledge historic harms of transportation while also taking steps to address historic injustices and affectively working towards making an equitable transportation future. Based on that feedback, the Equity Work Group recommended a revised definition for MnDOT leadership to consider. MnDOT leadership built on that recommendation to clarify what transportation equity means to the agency resulting in a statement of commitment to transportation equity.
204	Chapter 4 - Transportation Equity: "MnDOT acknowledges the transportation system and agency decisions have underserved, excluded, harmed and overburdened some communities. We understand some of our past decisions denied Black and Indigenous communities as well as people with disabilities the full participation of transportation benefits. These and other underserved communities have historically carried disproportionate burdens of transportation decisions."	Also remove "historically" because it's happening today.	Wording	Equity	None	No changes made. This language is a part of MnDOT's Transportation Equity Statement of Commitment. Staff engaged with over 1,000 people both within MnDOT and with community members and representatives of community-based organizations to provide feedback on the draft definition. This engagement process took over three months. People commented it is important for MnDOT to acknowledge historic harms of transportation while also taking steps to address historic injustices and affectively working towards making an equitable transportation future. Based on that feedback, the Equity Work Group recommended a revised definition for MnDOT leadership to consider. MnDOT leadership built on that recommendation to clarify what transportation equity means to the agency resulting in a statement of commitment to transportation equity.
205	Chapter 4 - Focus Areas, Safety: "Over the last decade and half, Minnesota has made targeted efforts to reduce traffic fatalities through its multi-agency Toward Zero Deaths initiative. Unfortunately, reduced traffic volumes resulting from COVID-19, along with the strain on enforcement during the pandemic, is thought to have produced higher speeds and more aggressive driving. That shift in behavior has continued despite a return to pre-pandemic traffic volumes. 2021 was the deadliest year on Minnesota's roads in over a decade. Recently, transportation and public safety officials launched a traffic enforcement and awareness campaign aimed at the spike in speed-related fatalities."	Consider changing "strain on enforcement" to "absence of enforcement" for a variety of reasons.	Wording	Not applicable	SMTP items to edit	Content edited to refer to change in enforcement. Not all contexts saw an absence.
206	N/A - General Comment	While counties agree that addressing the impacts to our environment brought about by the transportation sector is important, we are concerned with the potential loss of revenue to the Highway User Tax Distribution Fund (HUTDF) due to the VMT reduction goal. We think it would be helpful to know more about the impact the VMT reduction goal may have on the HUTDF and discuss alternative ways to address this loss in revenue. While some individual counties have implemented their own efforts to reduce vehicle miles traveled, as an association we know that a one-size-fits-all approach will not work for the state. AMC welcomes ongoing coordination with the state and locals as to how this VMT reduction goal will be implemented.	Target	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
207	Chapter 5 - Transportation Safety, Strategy 1: "Coordinate with partners to ensure the health, safety and security for people most vulnerable especially for those walking, rolling, bicycling and taking transit."	Request to acknowledge the differences and distinguish the actions it would take to fulfill the Strategy below in areas outside of urbanized areas and inside, specifically to better understand multimodal implementation efforts for State Trunk Highways in rural areas.	Content	Safety	None	No changes made. Sharing responsibility across all transportation partners is key to identifying, maintaining and enhancing priority connections. MnDOT and transportation partners strive to provide connections that prioritize people's movement and quality of life. This includes sidewalks, bicycle routes, roadways, waterways, intercity and regional bus, airports and railways. All connections, regardless of level, location or transportation type, need to be coordinated with one another to ensure a connected Minnesota.
208	Chapter 5 - Critical Connections: "Different geographies, communities and contexts will have different needs and opportunities to how they want to approach VMT and related strategies."	Carver County affirms the following statement on page 105 of the Plan and emphasizes the need to continue to measure VMT per capita particularly in areas seeing population growth.	Content	Transportation Options	None	No changes made.
209	Chapter 5 - Climate Action, Strategy 4: "Increase resiliency of people and communities by adapting infrastructure to withstand the changing climate."	The Climate Action Objective of Chapter 5 details that Minnesota is likely to see more severe weather, floods, and heavier rainfalls in the decades ahead. It is requested that Strategy 4 and its Actions of the subject Objective be emphasized, particularly in reference to the relationship between flooding and bridge crossings along vulnerable freight corridors.	Content	Implementation	None	No changes made. Disruptions from extreme weather are a significant disruption to many people for various reasons. Rural Minnesotans, for example, may have to travel more than 100 miles for a detour. No single reason will be listed in the action.
210	Chapter 5 - System Stewardship, Strategy 4, Action 3: "Improve water quality through the development and use of innovative stormwater management strategies."	Request to emphasize the action within the System Stewardship Objective below to improve water quality through innovative stormwater management strategies. Preserving and improving water quality is vital to sustaining the natural amenities distributed across the State.	Content	Environment	None	No changes made. Strategies and actions have different importance to different stakeholders. No emphasis will be applied.
211	N/A - General Comment	The SMTP should be clearly identified as a policy document and plan for MnDOT and not establish, shift, or increase regulatory, financial, or bureaucratic burden onto local agencies.	Content	Implementation	None	The SMTP policy direction is flexible for people to apply the strategies and actions in different ways. For partners with transportation decision-making authority, the SMTP provides a framework for changes to policies, programming and practices to move transportation toward the Minnesota GO Vision. For partners without transportation decision-making authority, the plan serves as a set of recommendations to understand how transportation can be integrated into their work and an opportunity to hold transportation partners accountable. See Chapter 7 for partner descriptions.
212	N/A - General Comment	SMTP focus areas and investment goals should reflect safety as a top priority.	Content	Safety	SMTP items to edit	The order of the objectives has been changed to have Transportation Safety listed first. Focus areas are listed in alphabetical order for the purposes of the plan update process.
213	N/A - General Comment	Existing funding formulas and baseline funding levels for road and bridge infrastructure should be maintained.	Content	Implementation	None	No changes made. The trend for the past decade has been to focus on maintaining and modernizing existing roads and bridges, while strategically completing the network for other modes. This continues to be a priority. With a changing climate and other disruptive events, there is also a focus on resiliency of the transportation system. Each of these components plays a key role in ensuring the transportation network is reliable. The System Stewardship objective is dedicated to strategically build, maintain, operate and adapt the transportation system based on data, performance and community needs and ensuring effective and efficient use of resources.
214	N/A - General Comment	The SMTP should clearly emphasize the importance of maintaining the existing system of roads and bridges in good condition.	Content	Implementation	None	No changes made. MnDOT and transportation partners are stewards of the transportation system. This includes the management of specific transportation assets and the overall transportation system. The trend for the past decade has been to focus on maintaining and modernizing existing roads and bridges, while strategically completing the network for other modes. This continues to be a priority. Everyone has a role in implementing the SMTP, it is about team work and collaboration to ensure the success of the transportation system. Additionally, a new section has been added to Chapter 7 that addresses the need for sustainable transportation funding.
215	N/A - General Comment	The SMTP should recognize the diversity of the state and acknowledge goals can and should be different across regions or communities.	Content	Implementation	None	No changes made. The policy direction is flexible for people to apply the strategies and actions in different ways across communities. For example, some strategies and actions could have more impact in rural settings. These include efforts to reduce fatal and serious injury crashes on Minnesota roads and at rail crossings, improving broadband access, collaborating with transportation providers to improve transit services and encouraging communities to implement policies to increase transportation choices. The SMTP Work Plan is intended to encourage communities to incorporate new practices and policy through our plans and technical guidance. MnDOT will continue to provide guidance and encourage changes that are needed to meet the Minnesota State Statute 174.01 and the performance measures included in the 2022 SMTP.
216	Chapter 5 - Table 5-3, Pavement Condition Performance Measure	Table 5-3 of the plan suggests a target that would allow for significant reductions in the current measured pavement conditions. Targets should be increased to ensure adequate resources for maintaining the State's transportation infrastructure in good repair.	Target	Implementation	None	Pavement conditions are currently better than targets. The pavement condition is dynamic. MnDOT has revised the target for pavements in poor condition from 10% to 8%. MnDOT has recently made long term investments and pavements are in historically good condition. Efforts are underway to determine resource allocation as part of the Minnesota State Highway Investment Plan.
217	Chapter 5 Climate Action strategies and actions - 2.2 and 2.4 and Healthy Equitable Communities strategies and actions - 1.2, 1.3, 1.4, 2.3, 2.5	The Climate Action Strategies and Actions listed as 2.2 and 2.4, as well as Healthy Equitable Communities Strategies and Actions 1.2, 1.3, 1.4, 2.3 and 2.5, suggest MnDOT should play a role in local land use decisions and development of local climate action plans. This should be removed or revised to clarify local land use decisions are out of the purview of MnDOT and acknowledge local elected leaders know best what land use is appropriate.	Content	Land Use	SMTP items to edit	Content edited to add Land Use call-out box in Chapter 5. The SMTP intent is to recognize this relationship and coordinate transportation and land use planning among transportation partners, stakeholders and the public.
218	Chapter 5 - Table 5-5: Critical Connections Performance Measures	Table 5-5 suggests reasonable reliability on the National Highway System could be as low as 80%. CEAM agrees with MCEA's assertion that the minimum reliability target should be at least 90%.	Target	Other	SMTP items to edit	Content edited to 90% target for travel time reliability. In Chapter 6 - MnDOT's intent is to expand travel demand management strategies to collaboration with partners. Diversify travel choices, such as route, time of travel and mode. Provide people with effective choices to improve travel accessibility and reliability.

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219	Chapter 6 2022 - 2027 Work Plan: Planning, Policy and Guidance - "Revise Cost Participation for cooperative construction projects and maintenance responsibilities between MnDOT and Local Units of Government Policy to incorporate explicit considerations for SMTP commitments including climate, equity and health."	Page 125 indicates a plan to revise cost participation and maintenance responsibilities between MnDOT and local agencies. Any changes in cost participation and/or maintenance responsibilities must be done in cooperation with the local agencies and must not shift further burdens onto local agencies.	Content	Implementation	SMTP items to edit	Added language to work plan item to identify under what circumstances MnDOT should cover a greater share of the project costs.
220	Chapter 6 2022 - 2027 Work Plan: System Stewardship and Operations - "Expand the diversity of MnDOT's contractor pool for more opportunities for women, people with disabilities, Veterans and BIPOC to perform MnDOT work."	Page 125 lists a plan to expand the diversity of MnDOT's contractor pool. CEAM concurs with the MCEA's recommendation to have the Office of Civil Rights perform an audit annually.	Content	Implementation	None	No changes made. MnDOT's DBE program is administered in accordance with state and federal requirements. MnDOT's project staff reviews the performance of every DBE firm that is performing work for credit on the project to ensure the DBE is meeting the Commercially Useful Function requirements of the DBE program. During the construction of the project there is frequent engagement with all parties on the work of the project, including DBE firms, non-DBE firms, the prime contractor, and MnDOT staff. This information is public and is retained by MnDOT's Office of Civil Rights
221	Chapter 6 2022 - 2027 Work Plan: Transportation Safety - "Integrate Safe System approach in transportation safety processes and initiatives."	Page 127 indicates a plan to integrate Safe System approach in transportation safety processes and initiatives. CEAM also requests more discussion before moving toward adoption of Safe Systems.	Content	Safety, Implementation	None	No changes made. MnDOT will work with transportation partners to develop understanding of and strategies to implement a Safe System approach.
222	N/A - General Comment	CEAM members have been involved in numerous meetings with MnDOT staff regarding Limited Use Permits (LUPs) for multimodal transportation facilities within MnDOT rights-of-way. The current philosophy being used in the LUP, and subsequent revisions, is counter to the goals stated within the SMTP. CEAM encourages MnDOT to align with the goals and policies within the SMTP when working with local agencies on these types of agreements and/or infrastructure plans.	Content	Implementation	None	No changes made. The 2022 SMTP is a policy direction that provides the framework for changes to policies, programming and practices to move transportation toward the Minnesota GO Vision. Rethinking the role of transportation right-of-way has been included in the 2022 SMTP as it can act as a powerful catalyst for the future of transportation, environment and economy. LUP process are outside the scope of the SMTP. Feedback will be shared with MnDOT staff as applicable.
223	Chapter 1, Figure 1-2: Statewide Multimodal Transportation Plan process	is pixelated and needs to be updated for visual clarity	Design	Other	SMTP items to edit	Content edited.
224	Chapter 2, Focus Areas - Safety: "2021 was the deadliest year on Minnesota roads in more than a decade. A mix of traditional and new practices and methodologies are needed to prevent and mitigate human error and ensure people are safe."	It's noted that 2021 was the deadliest year on Minnesota roads and that the number of crashes increased. It would be helpful to provide some analysis or evaluation of why that is the trend or what is causing the increase.	Content	Safety	None	No changes made. See Chapter 3 - Safety section that further delves into traffic crash trends including automobile, pedestrian and bicycle incidences and data.
225	Chapter 2, Highway Reliability & Congestion: "Although congestion is currently projected to increase in the coming years."	Page 26: last paragraph; It's noted that congestion is currently projected to increase in the coming years. Is it anticipated to return to pre-pandemic levels? Exceed pandemic levels? More explanation would be helpful here. In line with this, does MnDOT have plans to help curb the projected congestion whether through policy decisions or investments? Increasing trips by low or no carbon modes helps both with congestion as well as climate impacts.	Content	Transportation Options	None	No changes made. Reference Chapter 2 - "Highway Reliability and Congestion" section for more information. MnDOT staff is working on producing 2021 NHS reliability data, which if available would be included in final plan. MnDOT keeps detailed data on motor vehicle congestion for the Twin Cities and collects and analyzes travel time reliability data for Greater Minnesota. Currently, MnDOT measures motor vehicle congestion in the metro area based on travel speed during peak periods. In Chapter 5-Critical Connections, there is an action that calls for leveraging travel demand management strategies as part of comprehensive congestion management planning. Additionally, the 2022 SMTP includes the new proposed VMT target, which will also help monitor the efficiency of the system.
226	Chapter 2, Bicycling and Walking: "Minnesota's statewide bicycling and walking trends can be seen in the results of MnDOT's Omnibus Survey, where respondents are asked which transportation modes they used over the past year. MnDOT's Omnibus Survey is a biennial public opinion survey that provides department leadership, managers and program staff with public feedback on MnDOT's core operations."	Page 28: 3rd paragraph references MnDOT's Omnibus Survey – it would be helpful to understand how many people/demographics/geographic regions this survey reaches to better put into context the response percentages.	Content	Other	SMTP items to edit	Glossary edited to include information about the Omnibus Survey.
227	Chapter 3, Safety: "U.S. roadways have become safer for people in vehicles."	Page 53: paragraph 1: "US roadways have become safer for people in vehicles" – is this accurate? In addition, what has been the trend for people walking, rolling, or biking? It's important that that is noted alongside the change in safety for people in vehicles.	Content	Safety	None	No changes made. For more trend information regarding Transportation Safety, see MinnesotaGO trend library that has updated trend papers dedicated to transportation safety. Also, see second paragraph in Chapter 3 - Safety section for more information on pedestrian and bicycle trend as well.
228	Chapter 3, Transportation Behavior: "Much of the travel behavior data available focuses on people traveling to and from work. Commuting, however, accounts for less than 20% of all trips. 28 Commutes have a unique role in determining peak travel demand across many modes. But people use transportation for a variety of reasons. People need to access grocery stores, health services, educational opportunities, social activities and more. The transportation system ensures people can reach all destinations safely, reliably and conveniently whatever their reason for travel."	Page 56: last paragraph; It is noted that much of the travel behavior data that is available is focused on commuter travel but that commuting trips account for less than 20% of all trips – is there a way we can get data for trips outside of commuting either now or in the future? Or, how will MnDOT account for the 80%+ trips that are not commuting when making transportation investment decisions?	Content	Other	None	No changes made. There is a data limitation. The SMTP work plan includes items to develop a better understanding of walking, bicycling, accessibility, and transportation equity. This work may provide insights as it unfolds over the next several years. See Minnesota GO trend library for the Transportation Behavior Trend that goes more in depth on this topic.
229	Chapter 4, Phased Approach, Phase 3: "Phase 3 included a collaboration with MnDOT's Artist-in-Residence, Marcus Young 楊墨, to facilitate the Council of Old and New Wisdom."	Page 67: paragraph 1 – text missing or unknown character following "MnDOT's Artist-in-Residence, Marcus Young"	Content	Other	SMTP items to edit	Content being edited.
230	Chapter 5, Table 5-1: Open Decision Making Performance Measures	Page 86: Table 5-1 under Project-Level Public Engagement Measures: the description could use more clarity on what this will actually look like.	Content	Targets	None	No changes made. The intent here is that this is considered and included in the SMTP Work Plan where there is a commitment from MnDOT to develop these.
231	Chapter 5, Table 5-1: Open Decision Making Performance Measures	Page 86: Table 5-1 under Partner Coordination: further explanation needed to understand exactly what will be measured and how.	Content	Targets	None	No changes made. The intent here is that this is considered and included in the SMTP Work Plan where there is a commitment from MnDOT to develop these.
232	Chapter 5, Transportation Safety Objective, Reducing Fatalities and Serious Injuries	Page 89: text gets cut off on the bottom of page and would be more easily understood if reformatted.	Design	Other	SMTP items to edit	Content edited.
233	Chapter 5, Table 5-2: Transportation Safety Performance Measures	please explain what "under development" or "in development" means within this table	Target	Other	None	No changes made. Further information on these performance measures can be found in Appendix I – Performance Measures. It's important to note that some measures are being developed further through the implementation of the 2022 SMTP Work Plan.
234	Chapter 5, Table 5-2: Transportation Safety Performance Measures	page 91: Table 5-2 – please identify timelines for the "target or desired direction" for each of the items in this table, similar to the "fatalities" and "serious injuries" measures.	Target	Other	None	No changes made. Further information on these performance measures can be found in Appendix I – Performance Measures. Information includes background on the target or desired direction chosen.
235	Chapter 5, Table 5-2: Transportation Safety Performance Measures	does MnDOT have a goal date for reaching 0 traffic fatalities or serious injuries for each mode? This would be helpful to include.	Target	Other	None	No changes made. Further information on these performance measures can be found in Appendix I – Performance Measures. Decreasing to 0 is a long term target to aspire towards. There are shorter term targets that help benchmark progress towards 0. The key being continually decreasing fatalities year after year.
236	Chapter 5, Table 5-3: System Stewardship Performance Measures	Page 96: Table 5-3 – please explain what "under redevelopment" means within this table.	Target	Other	None	No changes made. Further information on these performance measures can be found in Appendix I – Performance Measures. It's important to note that some measures are being developed further through the implementation of the 2022 SMTP Work Plan.
237	Chapter 5, System Stewardship, Action 4.4: "4.4 Implement practices that reduce chloride use during winter maintenance."	Page 99: 4.4 – Implement practices that reduce chloride use during winter maintenance; this does not seem to align with what is outlined in Table 5-3. According to table 5-3, the amount of chloride used per ton of solid is desired/targeted to increase. Please clarify.	Target	Other	None	No changes made. The use of liquid chloride is less harmful for the environment than the use of solid de-icing chemicals. The intent of this measure is to focus on harm reduction when weather calls for the use of de-icing chemicals for traveler safety.
238	Chapter 5, Table 5-4: Climate Action Performance Measures	Page 102: Table 5-4 – please explain what "in development" and "work plan item" mean within this table	Target	Other	None	No changes made. Further information on these performance measures can be found in Appendix I – Performance Measures. It's important to note that some measures are being developed further through the implementation of the 2022 SMTP Work Plan.
239	Chapter 5, Table 5-6: Healthy Equitable Communities Performance Measures	Page 110: Table 5-6 – please explain what "in development" and "work plan item" mean within this table	Target	Other	None	No changes made. Further information on these performance measures can be found in Appendix I – Performance Measures. It's important to note that some measures are being developed further through the implementation of the 2022 SMTP Work Plan.
240	Chapter 5, Modes and Users of the Transportation System	Page 113-115: This section would be better suited earlier in the document – potentially at the beginning of chapter 2?	Content	Other	None	No changes made. Mode call out section is located after Chapter 5 because it demonstrates all objectives, strategies and actions have multimodal integration.

SMTP Response to Comments

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
241	N/A - General Comment	We believe that the current draft vehicle miles traveled (VMT) targets and their positioning within the SMTP are inadequate in addressing our climate realities. Thus, we're joining other sustainable transportation advocates in recommending that the SMTP's VMT reduction targets be strengthened and that we continue to revisit these targets at periodic points to set bolder goals. Significant reductions in VMT will have outsized benefits in that it will advance almost every objective in the SMTP.	Target	Transportation Options	None	No changes made. The target will be reevaluated in five years. This is a starting point for engagement, partnership, and planning. MnDOT will finalize the target after SMTP public engagement concludes and engage with transportation stakeholders and partners on implementation strategies starting in fall 2022. MnDOT expects strategies to differ by community and place type.
242	N/A - General Comment	To strengthen the VMT targets, we also support moving the VMT targets to the Climate Action section to tie them to overall climate metrics.	Target	Transportation Options	None	No changes made. VMT is a measurement used to inform a number of decisions in transportation including operations, air quality, accessibility for active transportation options and more. It is not exclusively tied to reducing greenhouse gas emissions. Relocating the VMT target to Climate Action minimizes people's understanding of the role tracking VMT plays in other SMTP commitments like providing more transportation options and choice, accessibility, changes in travel over time, managing congestion and more. It is possible VMT could have made it into the SMTP regardless of the recommendation from the Sustainable Transportation Advisory Council given the limited opportunities to measure changes in the transportation system for many other SMTP commitments. There is a call out in Climate Action to talk about the interrelatedness of the objectives for climate action that includes acknowledgment of VMT in Critical Connections
243	Chapter 5, Transportation Safety Objective	To truly realize a sustainable, multi-modal transportation system, each mode must be safe and accessible to all individuals. We support the safety recommendations outlined in the "Transportation Safety" section. To ensure that our most vulnerable users can safely access sustainable modes, we would also like to recommend adding specific actions that will focus on decreasing speed limits for motor vehicles.	Content	Safety	SMTP items to edit	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0. The objectives were reordered to have Transportation Safety come first.
244	Chapter 5, Critical Connections Objective	Thus, we recommend that MnDOT should establish performance measures titled "Job Accessibility by Bicycle and Transit Relative to Job Accessibility by Car" in the "Critical Connections" section. This should measure the percent of jobs accessible by car that are accessible by transit or bicycle in 30 minutes and establish a target of 25% for each mode by 2040.	Target	Transportation Options	Yes	No changes made. This option will be explored through the development of the Multimodal Accessibility performance measures as part of SMTP implementation.
245	N/A - General Comment	Our concern with the SMTP is focused on Vehicle Miles Traveled and the reduction strategies that specifically address passenger vehicle behavior and encourage alternatives to using motorized passenger vehicles such as mass transit and walking. Mass transit and other alternatives mentioned are not readily available or practical throughout Minnesota. We suggest changing the miles reduction goal focus on vehicle miles travelled within the metro area or where transit is readily available. This change preserves the ability of our members to market their destinations regionally where personal vehicle travel is necessary and/or preferred to air travel.	Target	Transportation Options	Yes	Edited chapter 5 content to include tourism.
246	Chapter 3, Environment: "Transportation-related activities have contributed to the degradation of ecosystems and natural habitats over time."	"Transportation-related activities have contributed to the degradation of ecosystems and natural habitats over time, including the loss of agricultural land."	Content	Environment	SMTP items to edit	Content edited.
247	Chapter 3, Environment: "Alternative uses can help accommodate utilities, allow opportunities to increase clean and renewable energy production and provide strategies to revive and maximize the health of the environment."	Alternative uses can help accommodate utilities, allow opportunities to increase clean and renewable energy production, protect regenerative agricultural land, and provide strategies to revive and maximize the health of the environment.	Content	Environment	SMTP items to edit	Content edited.
248	Chapter 5, Table 5-4: Climate Action Performance Measures	Is it possible to measure and track the usage of alternative fuels or advanced biofuels? The state has priorities, policies, and statutory mandates addressing the importance alternative and biofuels. There are only 2 references to "biofuel" in the document. We believe that useful information could be made available if an additional row were added to Table 5-4 and Appendix I, Table I-4 that included the same measurement metrics as for the other line topics. We can assist you in acquiring the necessary information if you'd like us to help.	Target	Climate	None	The SMTP Climate Action objective focuses on reducing emissions from the transportation sector. This objective focuses on tailpipe emissions as this presents a significant near-term opportunity to curb GHG emissions. Lower emissions modes of travel (such as walking, rolling, bicycling and taking transit), electric vehicles, alternative fuels and innovative technologies and solutions can all help reduce GHG emissions. This is out of scope of SMTP, MnDOT is focused on reducing overall emissions.
249	Chapter 5, Climate Action Objective, Action 1.3: "Implement a clean fuels standard."	"Implement a technology neutral Clean Fuels Standard that incentivizes production and use of alternative fuels in Minnesota."	Content	Climate	None	No changes made. See Climate Action Action 3.1 "Implement a clean fuels standard."
250	Chapter 5, Climate Action Objective, Action 1.5: "Support non-fossil-based sources of electricity for trucking, rail, aviation and maritime use."	Aviation, particularly commercial aviation, is notoriously difficult to electrify. A more likely route to decarbonize commercial aviation is the use of sustainable aviation fuels. SAF production is a rapidly expanding market and the commercial aviation sector has committed to using 35 billion gallons by 2050. As a state, MN needs to support/incentivize production in MN to meet our commercial aviation needs. The word "fuel" should be substituted for "electricity", for the same reasons as the above comment	Content	Climate	None	No changes made. The SMTP has to balancing competing priorities and there are often times commitments in one area will conflict with other commitments in the plan. Moving people and goods by air is a critical piece of Minnesota's transportation system. Industry innovations are exploring options to reduce environmental impacts while supporting economic opportunities.
251	Chapter 6, 2022-2027 Work Plan, Climate Action and Public Health	I don't see the Clean Fuels Standard anywhere in the Climate Action section. Leading or Partnering on implementing a Clean Fuel Standard needs to be in the work plan somewhere. Maybe that could go on the next page under "Lead" since they talk about a carbon reduction strategy in that section. We believe that the work toward a Clean Fuels Standard would be appropriately mentioned in the Climate Action section. Again, we'd be happy to offer whatever assistance you might need.	Content	Climate	None	No changes made. See Climate Action Action 3.1 "Implement a clean fuels standard."
252	Appendix I - Table I-4: Climate Action Performance Measures	This table needs the same info added about alternative fuels/biofuels/advanced biofuels that Megan pointed out. The state has priorities, policies, and statutory mandates addressing the importance alternative and biofuels. There are only 2 references to "biofuel" in the document. We believe that useful information could be made available if an additional row were added to Table 5-4 and Appendix I, Table I-4 that included the same measurement metrics as for the other line topics. We can assist you in acquiring the necessary information if you'd like us to help.	Target	Climate	None	No changes made. SMTP uses "non-fossil-based fuels" to be inclusive of all current and future fuel technology. Biofuels apply in this context.
253	Chapter 5, Open Decision Making Objective	We encourage this objective to be strengthened through greater reference to accountability. Similar to a principle of the Council's Public Engagement Plan, Open Decision Making should include an expectation that residents and communities can see how their invited participation will affect specific outcomes.	Content	Engagement	None	No changes made. In Open Decision Making, strategy 2 encourages regular two-way communication with partners, stakeholders and the public to continuously gather feedback. Additionally, the 2022 SMTP is committed to ensuring transparent and equitable decision making as well as tracking and increasing the public trust and confidence in MnDOT. Further, the action encouraging public engagement plans notes that information should "clearly articulate decision points."
254	Chapter 5, System Stewardship Objective	The Council supports highlighting the importance of the Stewardship actions and suggests including additional actions related to working with state and local entities to assure that adequate funding is provided to maintain these important, but aging facilities.	Content	Implementation	None	No changes made. The trend for the past decade has been to focus on maintaining and modernizing existing roads and bridges, while strategically completing the network for other modes. This continues to be a priority. Everyone has a role in implementing the SMTP, it is about team work and collaboration to ensure the success of the transportation system. Additionally, a new section has been added to Chapter 7 that addresses the need for sustainable transportation funding.
255	Chapter 5, Critical Connections Objective	The SMTP could be improved by explicitly defining and referencing TDM and adding TDM strategies in addition to strategy 5.3. TDM-related strategies and actions already also appear within the Healthy and Equitable Communities and Climate Action objectives though not referenced as such. To bring all of these related strategies and actions together it might be most useful to begin with an action to create a statewide TDM plan. A statewide plan would greatly support and improve the ability of MnDOT and the Council to implement TDM strategies, including identifying the needed funding to advance these actions.	Content	Transportation Options	None	No changes made. Strategies to improve transportation options, reduce greenhouse gas emissions, and decrease vehicle miles traveled will be addressed during plan implementation. Most work plan items were drafted to allow opportunity to find the right solutions to pursue in collaboration with our partners.
256	Chapter 5, Healthy Equitable Communities Objective	Consider including more actions relating to specific environmental concerns such as air quality, urban heat islands, and water quality that can promote greater accountability on this objective in the planning, design and implementation of individual projects.	Content	Environment	None	No changes made. Environmental concerns are addressed in Climate Action Objective. This objective includes emphasis on Resilient and sustainable solutions need to be centered on community voices, especially underserved communities who are facing severe climate change impacts. It is crucial that coordination and consultation with impacted communities occurs early and often, so the community can be a partner in creating effective, sustainable and adaptive solutions that work for them. Additionally, Climate Action has strategies and actions that are dedicated to integrating climate change considerations into transportation decision making, developing corridor and regional vulnerability assessments and developing state, regional, county and city climate action plans.

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257	N/A - General Comment	In particular, we are concerned about the goals included in the SMTP to reduce per capita vehicle miles traveled (VMT) in Minnesota. While a reduction in VMT is a laudable goal, it appears that the reduction goals included in the SMTP include all motor vehicles. We do not believe that the goals, as currently articulated in the SMTP, consider the significant increases in freight flows that we expect to see in Minnesota through 2050. In November 2021, the United States Department of Transportation projected that freight volumes will grow by 50% through 2050. This projected growth in freight reflects changes in consumer demand and expectations as well as changes and evolutions in supply chain management. Any move to artificially curtail the growth in freight flows through a statewide, multimodal goal to reduce VMT will hurt both Minnesota businesses and Minnesota consumers. More broadly, we share the concerns raised by the Minnesota Freight Advisory Committee (MFAC) about the fact that freight is largely under-represented throughout the SMTP. As noted above, consumer demand and industry changes will continue to push freight volumes higher and higher in the years to come. In its comments, MFAC has made many recommendations about how to better incorporate freight into the SMTP. We strongly encourage the Department to carefully review these recommendations and incorporate them into the final version of the SMTP.	Target	Transportation Options	SMTP items to edit	Content added to Chapter 3 to address freight trends and concerns more clearly.
258	N/A - General Comment	Similarly, we are concerned that the broad, statewide VMT reduction goals included in the SMTP will negatively impact the ability of Minnesota's vital tourism industry to bounce back from the challenges of the pandemic and grow over time. Many communities throughout Greater Minnesota, in particular, rely on tourism as a vital component of their economic livelihood. Tourism in Greater Minnesota is heavily reliant upon travel by passenger vehicle. It is not clear to us that the SMTP's VMT reduction goals, as currently stated, provide adequate consideration of the significant negative impacts that may be experienced by tourism-dependent communities and business across the state.	Target	Transportation Options	Yes	Edited chapter 5 content to include tourism.
259	N/A - General Comment	As a point of order, we also request that MNDOT include both a statewide and per capita goal in the final plan, versus just the 14% per capita reduction recommendation. Both documents outlining MNDOT's response to the 2020 and 2021 STAC VMT reduction recommendations indicate a commitment to setting both per capita and statewide goals; the adopted SMTP should follow through on that commitment to transparency. For all of the reasons outlined in the June 2022 letter included with this comment, we continue to support the STAC's original vehicle miles traveled (VMT) reduction goal of 20% statewide by 2050 for inclusion in the final SMTP. An aggressive, clear statewide goal to put Minnesota on the path to achieving net-zero climate obligations by 2050 is critical at this moment, and a 14% per capita reduction goal does not meet the moment.	Target	Transportation Options	None	No changes made. Mndot is proposing a per capita target versus the statewide target approach recommended by the Sustainable Transportation Advisory Council (STAC) to track how VMT is changing in relation to population growth. Total (statewide) VMT obscures differences between communities and the people who live in them. Measuring per capita also allows for comparisons across regions and with other states.
260	N/A - General Comment	Even under a scenario with strong EV sales penetration, MNDOT should align all of its transportation investments and policies with efforts to help Minnesotans travel around the state without having to use their cars for every trip. VMT reduction—enabled in particular by strong state investments in walking, biking, and public transit infrastructure in major metropolitan areas—will be necessary to remain on track to achieving shared climate goals. At a national scale, RMI has determined that a 20 percent reduction in VMT is required alongside the adoption of 70 million EVs.	Target	Transportation Options	None	No changes made. In Chapter 5, Climate Action objective is committed to enhancing transportation options and technology (including electric vehicles) to reduce greenhouse gas emissions. Climate Action objective, Strategy 1 is dedicated to transitioning the transportation sector away from dependence on fossil-based fuels. Additionally, two performance measures have been developed (see Table 5-4) that have established targets for both the registration and sale of electric vehicles in Minnesota; ultimately with a goal of 100% of new light-duty vehicles sold in Minnesota are electric or another form of zero emission vehicle by 2040. Future, Critical Connections strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.
261	Executive Summary, Chapter 1 or Chapter 2	In the introductory sections of the Executive Summary and in either Chapter 1 or 2, provide a definition of what is meant by "moving goods." This is necessary because while the general public understands the movement of people, especially as it affects their own lives (as illustrated by the quotes presented in the SMTP Chapters), most people are not aware of freight movement or the role it plays in their lives. People want the store shelves to be fully stocked with goods from throughout the world, but are generally unaware of how that operationally occurs. If it feels unbalanced to spend this time and space on the definition of moving goods, do the same for defining what is meant by "moving people." We suggest something along the lines of: "The movement of goods is how we get the stuff that all of us consume in our everyday lives. It includes the transport of raw materials, semi-finished goods and finished goods (including agricultural and food products, consumer goods, fuel, construction materials, energy production components, etc.) from point of origin, through value-added production stages, to distribution centers to delivery to the end consumer. The movement of goods involves commercial trucks on roads and bridges, freight rail, ships and barges on waterways, pipeline, and air-freight."	Content	Other	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
262	Executive Summary	Additionally, in the Executive Summary, under "Focus Areas" (page 3, bottom of page), add to the end of the "Economy and Employment" paragraph: "A vibrant economy depends upon an effective transportation system able to move raw materials, semi-finished goods and finished goods from point of origin, through manufacturing steps to the consumer – safely and efficiently."	Content	Other	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
263	Executive Summary	In the Executive Summary, under "What is Directing This Plan" (page 3, top of page), we recommend inserting: "Geo-political issues along with the pandemic also uncovered frailties in the global supply chain, upending how Minnesotans secure basic goods and services." following the sentence: "The SMTP was developed in the midst...worked, traveled and engaged with each other."	Content	Other	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
264	Chapter 3 - Economy	In Chapter 3 (What is Changing), in the section on the Economy (page 47-48), there is mention of how the pandemic affected workforce environment and flexibility, but not on how the pandemic affected supply chains. We recommend that this summary be expanded to include: It is important to reference the projected growth (note: NOT pandemic-related) in freight demand/volume. USDOT, in November 2021, projected that freight tonnage will grow by 50% between 2020 and 2050; this projection is consistent with Surface Transportation Board projections. Supply chain disruptions, and ensuing accelerated evolution in supply chain dynamics are significant trends affecting Minnesota's transportation system. Consumer expectations for the retail marketplace are changing with an increase in e-commerce and delivery of products directly to consumers. The last two trends have implications for distribution center siting, land use, job density, and transportation connections. Note that the Section on "Economy and Employment" in Chapter 4 (page 75) does capture some of these elements (excluding growth in freight demand), although the concepts are not delivered comprehensively nor brought forward elsewhere in the plan.	Content	Other	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.

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ID	Chapter or Appendix	Comment	Type	Category	Action	Response
265	Executive Summary - "What is different from the previous SMTP"	The Executive Summary identifies three "What is Different from the Previous SMTP?" sections (Climate, page 4, Equity, page 5, and Health, page 6). These sections neglect the movement of goods/freight, and yet freight plays a role in each of these topics. Climate: This section should reference the projected growth in freight demand as a factor that must be considered in formulating policies addressing climate change (See above USDOT November 2021 reference). Furthermore, add to the end of the second paragraph: "... and that freight stay sufficiently mobile to support a growing economy." We argue that much more freight-oriented research is needed to understand the pros and cons of zero-emissions freight. Equity: We respectfully inquire whether equity discussions have addressed the following elements, which involve freight movements: i. Access to goods for community consumption (including food deserts) ii. Access to quality jobs and identification of what transportation assets are needed for those job centers iii. How to balance the above with livable/sustainable communities Health: We respectfully inquire whether health discussions have addressed the following elements: i. Lack of access to jobs as a public health issue; what transportation assets are needed to support those job centers? ii. Food deserts	Content	Other	SMTP items to edit	Content added to Chapter 3 to address freight trends and concerns more clearly. The intent for the "What is different from the previous SMTP" section was to be a high level overview of new major themes that have been embedded throughout the plan. It is not meant to be mode specific.
266	Executive Summary - "What is different from the previous SMTP"	MFAC suggests adding a fourth "difference" to the "What is Different from Previous SMTP?" discussion in the Executive Summary: "Evolving Supply Chain Dynamics." The summary should address: Projected freight growth by 2050 (see USDOT November 2021 reference above). Evolving long-term consumer expectations of the marketplace (e-commerce). In the past few years, there has been a significant increase in the volume of goods delivered directly to end consumer locations, vs. the traditional distribution center to store model. This impact has not been fully realized due to the decrease in consumer travel during the same time period. Supply chain optimization has moved from lean, "just-in-time" delivery to "just in case" inventory maintenance, along with growth in demand for distribution centers. This in turn has implications for shifting job center locations and land use patterns. Challenges & opportunities for expanding use of alternative energy freight assets.	Content	Other	SMTP items to edit	Content added to Chapter 3 to address freight trends and concerns more clearly. The intent for the "What is different from the previous SMTP" section was to be a high level overview of new major themes that have been embedded throughout the plan. It is not meant to be mode specific.
267	Chapter 5, Critical Connections Objective	The SMTP is not clear on whether the VMT reduction goal includes freight movements or not; language in the Executive Summary and on page 54 in Chapter 3 indicate that VMT reduction goals include all motor vehicles. At present, VMT reduction goals for freight would be in direct contradiction to projections for freight growth. In addition, discussion on VMT reduction strategies specifically address passenger vehicle behavior and alternatives to using motorized passenger vehicles (transit, walking, biking, scooters, etc.).	Target	Transportation Options	Yes	No changes made. We are not able to separate freight from the VMT calculation at this time. We will work on how to account for VMT and freight as part of VMT implementation. The primary focus is on personal vehicles. Heavy-duty trucks only make up 15% of transportation emissions compared to 60% for light duty trucks and cars. Any freight strategies will be evaluated with transportation partners in the future. MnDOT staff will explore a range of strategies in collaboration with partners starting this fall related to increasing travel options, travel demand management, and highway spending. MnDOT expects final strategies to support economic activity in Minnesota.
268	Chapter 5, Critical Connections Objective	Separate from freight concerns, any non-metro region that depends upon tourism as part of its economic base should also object to this measure: tourists arrive at nearly all non-metro Minnesota tourist destinations via passenger car. Are VMTs associated with zero-emission vehicles bad for some alternative reason? At a minimum, this concept needs further exploration and socializing with affected sectors/communities/economies. In the interim, we suggest the following alterations to clarify and correct: Change "Reduce the number of vehicle miles traveled across Minnesota per capita by 14% by 2040" to "Reduce the number of vehicle miles traveled by private passenger vehicles within metropolitan areas in Minnesota per capita by 14% by 2040"	Target	Transportation Options	Yes	Edited chapter 5 content to include tourism.
269	Chapter 5, Critical Connections Objective, Strategy 2 and Strategy 4	We would like to see additional language added to strategies 2 and 4 in this section, and accompanying expansion of action items in Chapter 5. For Strategy 2: add the following clause to the end of the sentence: "...in a manner that supports a vibrant and growing economy." For Strategy 4: add the following clause to the end of the sentence: "... acknowledging the importance of freight movements to economic and community health." Note that Strategy 5 in the Executive Summary is not present in the Critical Connections section of Chapter 5. As this strategy refers to investments in "multimodal" solutions, we assume this does not refer to freight movement as "multimodal" is consistently used throughout the SMTP to mean transportation options for moving people. In the freight world, "multimodal" means something different. If this strategy is intended to address investment in multimodal freight solutions, then we would request that a definition of "multimodal" be inserted early in the document clarifying this and consistent use of the term throughout the document. MFAC does encourage that Executive Summary strategy 5 be included and defined to include multimodal freight solutions.	Content	Other	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
270	N/A - General Comment	Finally, transportation revenue is critical for implementing the goals and plans spelled out in the Draft SMTP. However, this draft does not include any language in the main chapters that explains the importance of adequate, dependable, long-range funding in order to realize the department's vision for the future. The plan does not provide any context in terms of the cost to maintain the system, the cost to improve the system and the adequacy of current or future transportation revenue. We recommend that the need for sustainable, long-term funding be boldly named and addressed in the text of the SMTP and in the Executive Summary in a manner similar to what our neighboring states have done in their overarching statewide plans (Iowa in Motion 2050, Michigan Mobility 2045 and Wisconsin Connect 2050).	Content	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
271	Chapter 3 - Economy	The Draft SMTP does not adequately address freight, or account for the needs, trends, or role of freight in its summary of "what's changing" (Chapter 3), the plan's focus areas (Chapter 4), or its objectives, strategies and actions (Chapter 5). Freight is treated as a secondary consideration, rather than a core aspect of the plan. •Changing technologies (automated vehicles, electrification, decarbonization). Continued growth in freight volume (for example, US DOT anticipates that freight volume will grow by 50% between 2020 and 2050). Workforce shortages. Weaknesses in the global supply chain that were exposed by the COVID-19 pandemic, and companies' responding efforts to make their supply chains more flexible, agile and resilient through development of alternate trade lanes, on- or near-shoring, increased inventories and establishing more, and more widely distributed, distribution centers. Changing consumer expectations driving an increase in e-commerce. The SMTP should acknowledge these trends and better incorporate freight into the SMTP. We have read the SMTP comments prepared by the Minnesota Freight Advisory Committee (MFAC) (letter dated September 16, 2022) in regards to how freight could be more effectively addressed in the SMTP and we support and echo MFAC's comments.	Content	Other	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
272	N/A - General Comment	The SMTP does not address funding as a critical factor for SMTP success. Transportation funding continues to be a challenge for all states, including Minnesota. It is important that the SMTP stress that adequate, dependable, long-range funding is needed to maintain, adjust and grow Minnesota's transportation system in a manner consistent with the SMTP vision.	Content	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.



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ID	Chapter or Appendix	Comment	Type	Category	Action	Response
273	Chapter 5, Critical Connections Objective	The vehicle miles traveled (VMT) reduction goals presented in the SMTP are unclear. VMT reduction strategies discussed in the SMTP focus on the use of passenger vehicle alternatives, land use choices encouraging fewer passenger vehicle trips, and work-from-home workforce patterns (which notably don't apply to most transportation or industrial jobs). However, the overarching text implies the VMT reduction goals apply to all motor vehicles. Applying these goals to freight transportation ignores the trends described above, including the projected significant growth in freight volume. It also fails to consider how our industries (food production, manufacturing, agriculture, mining, etc.) rely on freight movements for production and delivery and to generally keep commerce moving.	Target	Transportation Options	None	No changes made. MnDOT staff will explore a range of strategies in collaboration with partners starting fall 2022 related to travel options, travel demand management, and highway spending. MnDOT expects final strategies to support economic activity in Minnesota.
274	Chapter 5, Critical Connections Objective	The goals of the VMT reduction goals are also hazily stated. If the goal is to reduce emissions (VMT reduction is first introduced in a Climate section in the Executive Summary), then the projected growth of electric vehicles should off-set the need for the reduction goal. If the goal is to alter land-use and community development patterns, then it should be acknowledged that most of the solutions discussed apply to metropolitan areas. Also not addressed are the implications for the many areas of the state that rely on tourism as part of their economic base; nearly all of the tourists arrive at their destinations via passenger vehicle (outside of the Twin Cities metropolitan area). We recommend that the VMT reduction goal be reconsidered, its objectives and application be more clearly stated, and that it be better vetted with both the freight and industrial stakeholders, as well as with outstate communities.	Target	Transportation Options	Yes	Edited chapter 5 content to include tourism.
275	Chapter 6, Next Steps for the Family of Plans	In "Next Steps for the Family of Plans" (page 128), there is no mention of a planned update to the Statewide Port and Waterways Plan, which was adopted in 2014. This is the only one of the plan family that does not have a scheduled update. We suspect this was an oversight, but would like this addressed	Content	Other	SMTP items to edit	Content edited to reflect that the Statewide Ports and Waterway Plan is anticipated in 2025. The State Rail Plan and Minnesota State Freight Plan are in process. The Statewide Ports and Waterway Plan will follow the adoption of the rail and freight plans.
276	Chapter 3 - Economy	The Draft SMTP does not adequately address freight, or account for the needs, trends, or role of freight in its summary of "what's changing" (Chapter 3), the plan's focus areas (Chapter 4), or its objectives, strategies and actions (Chapter 5). Freight is treated as a secondary consideration, rather than a core aspect of the plan. •Changing technologies (automated vehicles, electrification, decarbonization). Continued growth in freight volume (for example, US DOT anticipates that freight volume will grow by 50% between 2020 and 2050). Workforce shortages. Weaknesses in the global supply chain that were exposed by the COVID-19 pandemic, and companies' responding efforts to make their supply chains more flexible, agile and resilient through development of alternate trade lanes, on- or near-shoring, increased inventories and establishing more, and more widely distributed, distribution centers. Changing consumer expectations driving an increase in e-commerce. The SMTP should acknowledge these trends and better incorporate freight into the SMTP. We have read the SMTP comments prepared by the Minnesota Freight Advisory Committee (MFAC) (letter dated September 16, 2022) in regards to how freight could be more effectively addressed in the SMTP and we support and echo MFAC's comments.	Content	Other	SMTP items to edit	Content edited to reflect the role of freight to the state, national and global economy. Background information now includes to anticipate growth in freight tonnage, supply chain challenges, growth in e-commerce, and more.
277	N/A - General Comment	The SMTP does not address funding as a critical factor for SMTP success. Transportation funding continues to be a challenge for all states, including Minnesota. It is important that the SMTP stress that adequate, dependable, long-range funding is needed to maintain, adjust and grow Minnesota's transportation system in a manner consistent with the SMTP vision.	Content	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
278	Chapter 5, Critical Connections Objective	The vehicle miles traveled (VMT) reduction goals presented in the SMTP are unclear. VMT reduction strategies discussed in the SMTP focus on the use of passenger vehicle alternatives, land use choices encouraging fewer passenger vehicle trips, and work-from-home workforce patterns (which notably don't apply to most transportation or industrial jobs). However, the overarching text implies the VMT reduction goals apply to all motor vehicles. Applying these goals to freight transportation ignores the trends described above, including the projected significant growth in freight volume. It also fails to consider how our industries (food production, manufacturing, agriculture, mining, etc.) rely on freight movements for production and delivery and to generally keep commerce moving.	Target	Transportation Options	None	No changes made. MnDOT staff will explore a range of strategies in collaboration with partners starting fall 2022 related to travel options, travel demand management, and highway spending. MnDOT expects final strategies to support economic activity in Minnesota.
279	Chapter 5, Critical Connections Objective	The goals of the VMT reduction goals are also hazily stated. If the goal is to reduce emissions (VMT reduction is first introduced in a Climate section in the Executive Summary), then the projected growth of electric vehicles should off-set the need for the reduction goal. If the goal is to alter land-use and community development patterns, then it should be acknowledged that most of the solutions discussed apply to metropolitan areas. Also not addressed are the implications for the many areas of the state that rely on tourism as part of their economic base; nearly all of the tourists arrive at their destinations via passenger vehicle (outside of the Twin Cities metropolitan area). We recommend that the VMT reduction goal be reconsidered, its objectives and application be more clearly stated, and that it be better vetted with both the freight and industrial stakeholders, as well as with outstate communities.	Target	Transportation Options	Yes	Edited chapter 5 content to include tourism.
280	Chapter 6, Next Steps for the Family of Plans	In "Next Steps for the Family of Plans" (page 128), there is no mention of a planned update to the Statewide Port and Waterways Plan, which was adopted in 2014. This is the only one of the plan family that does not have a scheduled update. We suspect this was an oversight, but would like this addressed	Content	Other	SMTP items to edit	Content edited to reflect that the Statewide Ports and Waterway Plan is anticipated in 2025. The State Rail Plan and Minnesota State Freight Plan are in process. The Statewide Ports and Waterway Plan will follow the adoption of the rail and freight plans.
281	N/A - General Comment	Every state's transportation system relies on adequate funding to keep the system in good repair and to make needed improvements. Transportation revenue is critical for implementing the goals and plans spelled out in the Draft SMTP. However, this draft does not include any language in the main chapters that explains the importance of adequate, dependable, long-range funding in order to realize the department's vision for the future. The plan does not provide any context in terms of the cost to maintain the system, the cost to improve the system and the adequacy of current or future transportation revenue.	Content	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
282	N/A - General Comment	Appendix F provides important information as to how funding flows currently for each mode, but again, there are no dollar amounts provided and no estimates as the future revenue. The section dealing with state funding for roadways combines trails with roadways which makes the flow chart much more complicated and the box for state transportation revenue seems to leave out the state fuel tax as a revenue source. Revenues from the sales tax on leased motor vehicles are treated differently than revenue from the sales tax on motor vehicle repair parts and short-term leases even though they function in exactly the same way. A statutory dedication directs revenue from the sales tax on leased motor vehicles to various transportation funds, just like the statutory dedication directs the sales tax on auto repair parts and short-term leases to the Highway User Tax Distribution Fund. One source is considered part of the general fund while the other is considered a "transportation revenue." Other states, including our neighboring states, have developed long-range transportation plans with much more extensive and insightful sections regarding transportation funding.	Content	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.

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283	N/A - General Comment	We would like to encourage MnDOT to also include some explanation of not only how the revenue is generated and distributed but how adequate the revenue is and the impact on the system if funding is not available to meet the needs and accomplish the many goals developed in this plan. If sufficient funding is not available, how will efforts to meet performance measures be prioritized? How will the goals associated with reducing greenhouse gases be achieved? We believe this is an important element that should be included in the main document, just as it is in the long-range plans of our surrounding states.	Content	Implementation	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
284	Chapter 5, Critical Connections Objective	The SMTP plan also includes new goals for reducing vehicle miles traveled (VMT) by 2040. We understand that this is related to the overall climate goals in the plan. However, the plan does not include any information or recognition of the financial impact of meeting this goal on dedicated transportation funds deposited in the Highway User Tax Distribution Fund. We believe that the plan needs to acknowledge this impact and preferably offer ideas for compensating for any revenue loss.	Target	Transportation Options	SMTP items to edit	Content added to Chapter 7 in the Managing Trade-offs section.
285	Chapter 4, Focus Areas, Equity: "Transportation equity means the benefits and burdens of transportation systems, services and spending are fair and just, which historically has not been the case. Transportation equity requires ensuring underserved communities, especially Black, Indigenous and People of Color, share in the power of decision making."	Consider removing "historically" because the impacts are ongoing, every day.	Wording	Equity	None	No changes made. This language is a part of MnDOT's Transportation Equity Statement of Commitment. Staff engaged with over 1,000 people both within MnDOT and with community members and representatives of community-based organizations to provide feedback on the draft definition. MnDOT leadership built on that feedback to clarify what transportation equity means to the agency resulting in a statement of commitment to transportation equity.
286	Chapter 4, Transportation Options: "VMT provides a measure of total travel by vehicle, travel changes over time and differences in travel among regions and state. When combined with other measures (e.g. accessibility, mode use, delay), VMT becomes a powerful indicator about how the transportation system is functioning. VMT tends to increase with population growth and in areas with lower density and long travel distances. Decreased VMT can have positive impacts on the overall health of people and the environment. For example, VMT bears a direct relationship to vehicle emissions, and can serve as a GHG emissions indicator."	Total travel by motor vehicle. If you don't say "motor" you're including bicycles, which are not counted in VMT.	Wording	Transportation Options	SMTP items to edit	Content edited.
287	Chapter 4, Safety: "New technologies like connected and automated vehicles (CAV) have the potential to reduce fatalities and injuries and significantly change the way that people travel. However, many questions still remain on how CAV will impact society as it relates to equity, liability and privacy. That is why it is important to consider the implications of this technology when planning for the future of transportation. One aspect of this is CAV readiness, which assumes a mix of non-automated, partially automated and highly automated vehicles on the roadway—which comes with several safety concerns—and unclear timelines for CAV adoption."	Consider adding discussion of other safety technologies, including red light cameras, speed cameras, vehicle speed governors.	Content	Safety	None	No changes made. Focus of content is on CAV technologies. The text mentions a mix of traditional and new practices and methodologies will likely be required to design the transportation system to prevent and mitigate human error without being prescriptive.
288	Chapter 5, How Will We Guide Ourselves Moving Forward? "How will we guide ourselves moving forward?"	PDF version is missing the question mark.	Wording	Not applicable	Yes	Content will be aligned between the pdf and web versions of the final document.
289	Chapter 5, Open Decision Making Objective: "Engaging with people using the transportation system means creating opportunities for people to influence decisions. Good engagement starts with understanding community wisdom and uses inclusive, accessible and varied tools to reach and hear communities. Communication must be effective; this means information is available, easy to find, culturally responsive and understandable. This includes using plain language and meeting the Americans with Disabilities Act (ADA) accessibility standards. Good engagement and communication result in decisions that better reflect the community's priorities."	ADA accessibility standards are the bare minimum. Consider making a stronger statement of accessibility.	Content	Equity	None	No changes made. Targets are reflective of the collaborative planning and decision making process.
290	Chapter 5, Open Decision Making Objective: "This work should be rooted in understanding and overcoming the history of transportation-related trauma and exclusion that underserved communities have historically faced. Some community groups—such as Black, Indigenous and People of Color (BIPOC)—may not be ready to start building relationships with agencies and staff. Trust in government beyond transportation agencies has been eroding over time especially in communities harmed by previous decisions."	Consider removing the word "previous" in the last line. Ongoing decisions are perpetuating harm, e.g. when a road harmful to a community is maintained. It could be the overall "best" decision because options to reduce harm are not feasible or acceptable to decisionmakers, but that decision perpetuates the harm.	Wording	Equity	None	No changes made. The intent of paragraph speaks to the understanding and overcoming the history of transportation-related trauma and exclusion that underserved communities have historically faced. Some community groups may not be ready to start building relationships with agencies and staff based on this history. Which is why "previous" is used, it points to trust that has been eroded because of history.
291	Chapter 5, Transportation Safety Objective Strategy 1 and Actions: "Coordinate with partners to ensure the health, safety and security for people most vulnerable especially for those walking, rolling, bicycling and taking transit. Implement more forgiving road design to mitigate the severity of crashes and the resulting injuries. Work with partners to create and implement shared values, actions and behaviors that build a traffic safety culture for all modes. Leverage partnerships to implement Toward Zero Deaths and Vision Zero strategies and road safety design initiatives. Implement best practices for people to feel safe and secure walking, rolling, bicycling and taking transit. Develop effective engagement efforts to educate local agencies and the general public on engineering solutions that will improve safety."	"More forgiving" typically means wider and faster, which is detrimental to walking, rolling and biking. Consider a qualifying statement to the effect of "in balance with other goals."	Wording	Safety	None	No changes made. The Transportation Safety Objective is dedicated to applying proven strategies to reduce fatalities and serious injuries for all modes while fostering a culture of transportation safety in Minnesota. Language aligns with the Safe System Approach, which is a people-centered, holistic approach to transportation safety.
292	Chapter 5, Transportation Safety Objective: Strategies and Actions: "Strategies"	Consider adding somewhere reducing exposure to crashes and reducing total energy in the "safe system" by reducing VMT and reducing total mass moving in the system.	Content	Safety	None	No changes made. VMT content is located in Critical Connections objective as well as a call-out in the Climate Action objective. VMT is a measurement used to inform a number of decisions in transportation including operations, air quality, accessibility for active transportation options and more, which is why it is a target in Critical Connections.

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293	Chapter 5, System Stewardship Objective: "Practicing environmental stewardship protects and improves natural and cultural resources. This includes focusing on equity, the environment and our economy while also planning for the near- and long-term stewardship of environmental resources. MnDOT and transportation partners can consider new environmental quality techniques, maintenance activities and alternative site design practices to preserve the state's valuable natural and cultural resources while reducing harm."	Consider changing "valuable natural and social resources" to "invaluable natural and social resources" to emphasize how critical they are to our society and not emphasize so much the economic value (though it, too, is great).	Wording	Other	SMTP items to edit	Content edited to remove "valuable" for clarity and easier readability.
294	Chapter 5, Transportation Safety Objective Strategy 2 and Actions: "Modify infrastructure to accommodate all modes of transportation using complete streets, context sensitive and Safe System approaches. Explore opportunities for lower cost solutions that can be deployed quickly. Design roads for appropriate speeds based on land use context and user needs. Design and maintain transportation infrastructure to support current and new technology with proven safety benefits for all users."	Considering acknowledging that congestion has a safety benefit (as we saw fatalities spike without it during the pandemic) and that sizing our roads appropriately can save lives.	Content	Safety	None	No changes made. This section is dedicated to strategies and actions of Transportation Safety, not adding additional context language. See Chapter 2, Highway Reliability and Congestion and Managed Lanes sections for additional trend and background context to congestion in Minnesota. Future, Critical Connections Strategy 5 says to "follow a tiered, phased approach to addressing mobility," which begins with people-power modes like walking and bicycling, telework and spot improvements before considering expansion.
295	Chapter 5, Critical Connections objective Strategy 6 and Actions: "Encourage modal shifts away from single-occupant vehicles through infrastructure improvements, education, programs and services. Use quick, low-cost and creative projects to gain public and institutional support for investing in permanent projects. Use data and community input to understand walking, rolling, bicycling and transit needs and preferences for vulnerable populations. Increase consumer awareness of transportation choices using education, outreach and incentives to inform travel decisions. Support complete streets implementation through education, trainings and technical assistance. Invest to make travel by non-single occupant vehicle more easily available and attractive to use."	There are incentives here but we also should incorporate disincentives, such as paying the true cost of parking, raising gas taxes, revising how roads are funded and economically discouraging destructive behavior in balance with social justice.	Content	Equity, Transportation Options	None	No changes made. Examining tradeoffs is needed to understand how best to use available resources and barriers that exist. As a part of implementation, strategies and actions will be evaluated for barriers, benefits and burdens to inform future transportation decisions.
296	Chapter 5, Critical Connections objective: "Ensuring transportation options can support communities by providing the necessary link between people and opportunities. Businesses need predictable and reliable access to suppliers and customers. People need access to jobs, school, food, childcare, health services and other destinations no matter where they live. To accommodate non-drivers, it is necessary to provide various transportation options like complete accessible sidewalk networks, shared mobility services, transit, shuttles, etc. All communities are designed differently and need various types of transportation networks. A well-connected local network can promote mobility choice, reduce local trips by vehicle and positively impact the environment."	"non-drivers" = "people who don't drive," which is like 1/3 of Minnesotans.	Wording	Other	SMTP items to edit	Content edited.
297	Chapter 5, Critical Connections objective: "Ensuring transportation options can support communities by providing the necessary link between people and opportunities. Businesses need predictable and reliable access to suppliers and customers. People need access to jobs, school, food, childcare, health services and other destinations no matter where they live. To accommodate non-drivers, it is necessary to provide various transportation options like complete accessible sidewalk networks, shared mobility services, transit, shuttles, etc. All communities are designed differently and need various types of transportation networks. A well-connected local network can promote mobility choice, reduce local trips by vehicle and positively impact the environment."	Revision to previous comment: Actually, we shouldn't be "accommodating" "non-drivers" or "people who don't drive," we should be encouraging all people to not drive and making that the safe, comfortable and efficient option.	Wording	Other	None	No changes made. Critical Connections objective is committed to maintaining and approving multimodal transportation connections essential for prosperity and quality of life. Not everyone has the ability to not drive. Transportation decision making must consider competing needs including for people and business that rely on motorized travel to meet daily needs.
298	Chapter 5, Critical Connections objective Performance Measures Table 5-5: "Vehicle Miles Traveled Number of miles traveled across Minnesota per capita (percentages shown in parentheses are the percent reduction from 2019) 10,691 miles per capita (2019) 10,263 (-4%) by 2025 9,835 (-8%) by 2030 9,515 (-11%) by 2035 9,195 (-14%) by 2040 Partner Number and trend and by urban, suburban and rural"	VMT is reference in the climate section as being housed here, but this measure is VMT per capita. VMT as a whole needs to come down; the climate doesn't know how many people-miles are traveled; it feels the impact of straight VMT. Same with safety; VMT regardless of how many people are in those vehicles increases the exposure of people walking and biking to deadly hazards.	Target	Climate, Environment, Safety	None	No changes made. A per capita VMT measure provides an understanding of how VMT is changing in relation to population growth. Total VMT obscures differences between communities and the people who live in them. VMT alone does not tell a complete story, but combining VMT per capita with other measures, such as access for walking and biking, electric vehicle access, fatalities and serious injuries, and transit reliability, can provide a more comprehensive way to measure our progress to provide transportation options that support healthy communities.
299	Chapter 5, Critical Connections objective Performance Measures Table 5-5: Traveler Delay Average delay per person in the Twin Cities 9.7 minutes (2018) ≤9 minutes per weekday Lead	This might not be the best metric. Congestion can help accomplish other goals and it doesn't account for users who avoided motor vehicle trips at peak times. People should be discouraged from traveling, especially during peaks, and delay is a good motivator.	Target	Transportation Options	None	No changes made. The SMTP does not intend to discourage travel but instead to make use of certain modes easier and more accessible to meet a range of transportation and community needs. We have to balance competing needs and some travel during peak periods is necessary for people and businesses to meet their daily needs.
300	Chapter 5, Healthy Equitable Communities Strategy 5 and Actions: "Leverage transportation solutions to improve public health. Integrate health and equity considerations in transportation planning, programming and project delivery using a Health in All Policies approach. Support opportunities for physical activity through walking, rolling and bicycling. Implement programs and investments that improve air quality and reduce noise especially for people experiencing the greatest impacts. Ensure convenient multimodal access to open space, parks and recreation areas. Increase equitable access to healthy, culturally appropriate and sustainable food through transportation options. Align transportation assets and services with community needs during public health emergencies."	Consider removing the "during" clause. We should align transportation assets and services with community needs all the time. Maybe instead say "especially during" if you really want to spell out the health connection.	Wording	Equity	None	No changes made. The language intent is align assets and services during public health emergencies. Intent is being met with current language. Considerations for community needs are addressed in System Stewardship, Healthy Equitable Communities and Open Decision Making.

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301	Chapter 5, Healthy Equitable Communities Strategy 3 and Actions: "Reduce combined housing and transportation costs for cost-burdened households. Improve first- and last-mile connections in neighborhoods and job centers. Support the construction of complete streets and a connected network to accommodate walking, rolling, bicycling and transit. Educate people on the impacts transportation decisions have on housing costs. Expand and enhance public transportation to improve access across the state. Promote infill development and land use practices that support walkable and bikeable communities."	Consider adding "that support transit." at the end of No. 5.	Wording	Transportation Options	None	No changes made. Walkable and bikeable communities inherently support transit use. However, the opposite is not always true. Tying "walkable and bikeable" to transit only could limit the range of options people consider to implement this action.
302	Chapter 5, Modes and Users of the Transportation System: "BARGES AND BOATS"	Consider "Ships, barges and boats," as "boats" connotes recreational vessels and would leave out the big freighters.	Wording	Other	SMTP items to edit	Content edited.
303	Chapter 5, Modes and Users of the Transportation System: "Motorized passenger vehicles are essentials modes for the transportation system. These are the most commonly used forms of transportation in the state. Passenger vehicles provide essential first- and last-mile connections for people and goods. Evaluating and retooling programs and practices can help transportation partners continue to provide people a robust network that meets user needs now and into the future."	"essentials" should be "essential"	Wording	Other	SMTP items to edit	Content edited.
304	Chapter 6, 2022-2027 Work Plan, Transportation Safety: "Expand efforts to ensure safe speeds. 2021 was the deadliest year on Minnesota's roads in over a decade due in part to reckless driving including high speeds. Partners, including the Department of Public Safety, have a role in decreasing speeds and improving transportation safety. Related objectives: Open Decision Making, Transportation Safety, Healthy Equitable Communities"	Consider technological approaches to reducing speeds, such as speed cameras and governors.	Content	Safety	None	No changes made. Chapter 4, Safety focus area section has language that mentions a mix of traditional and new practices and methodologies will likely be required to design the transportation system to prevent and mitigate human error. The work plan includes an item to text automated enforcement like cameras while evaluating equity impacts of their use.
305	Chapter 6, 2022-2027 Work Plan, Climate Action & Public Health: "Transition MnDOT's fleet to zero emission vehicles. MnDOT owns hundreds of light, medium and heavy duty vehicles. MnDOT has already started to transition the light and medium duty vehicles to zero emission vehicles (ZEV) options and will continue to do so. MnDOT is also exploring options for heavy duty vehicles. MnDOT will be a leader in the state enterprise by encouraging all state departments and agencies to transition to zero emission fleets. Related objectives: Climate Action, Healthy Equitable Communities"	Consider strategies to offset emissions that can't yet be eliminated.	Content	Climate, Environment	None	No changes made. The SMTP has strategies and actions that address a range of ways to prevent and mitigate emissions.
306	Chapter 6, 2022-2027 Work Plan, Equity: "Co-create stories about transportation in Minnesota in collaboration with communities. Center Minnesota's transportation story in people's lived experiences, especially for communities that have been harmed most by past decisions. Collaborate with partners and communities to identify dominant narratives, align our understanding of the power of storytelling and generate elements of a new transformational narrative that centers on transportation equity. Related objectives: Open Decision Making, Healthy Equitable Communities"	Consider replacing "past decisions" with "transportation decisions," as this harm is ongoing.	Wording	Equity	None	No changes made. The intent of paragraph references creating the transportation story in people's lived experiences from the past to inform work now and into the future.
307	Chapter 6, 2022-2027 Work Plan, Transportation Options: "Work with transportation partners to identify and advance statewide strategies for reducing per capita vehicle miles traveled (VMT) 20% by 2050. Opportunities to reduce vehicle miles traveled vary by geography, community and context. Work with partners to determine where there are the greatest opportunities to meet local travel needs and SMTP targets for VMT, greenhouse gas (GHG) emissions and multimodal accessibility. Develop guidance for regional planning with place-based strategies to reduce per capita VMT. Related objectives: Open Decision Making, System Stewardship, Climate Action, Critical Connections, Healthy Equitable Communities"	Per capita VMT reduction is good; Total VMT reduction is better and a more realistic measure of climate impact.	Target	Transportation Options, Climate, Safety	None	No changes made. A per capita VMT measure provides an understanding of how VMT is changing in relation to population growth. Total VMT obscures differences between communities and the people who live in them. VMT alone does not tell a complete story, but combining VMT per capita with other measures, such as access for walking and bicycling, electric vehicle access, fatalities and serious injuries, and transit reliability, can provide a more comprehensive way to measure our progress to provide transportation options that support healthy communities.
308	Chapter 6, 2022-2027 Work Plan, Transportation Safety: "Expand efforts to ensure safe speeds. 2021 was the deadliest year on Minnesota's roads in over a decade due in part to reckless driving including high speeds. Partners, including the Department of Public Safety, have a role in decreasing speeds and improving transportation safety. Related objectives: Open Decision Making, Transportation Safety, Healthy Equitable Communities"	Consider encouraging more stringent driver licensing and training to improve driver behavior.	Content	Safety	None	No changes made. This is out of scope of 2022 SMTP. Partners like those in engineering, enforcement, education and emergency response all have a role and responsibility to implementing an equitable, Safe System approach. Licensing is under the authority of the Department of Public Safety.
309	Chapter 2, Existing Transportation System, Table 2-2: " Scooter Sharing Bird is available in the Twin Cities; Lyft is exclusive to Minneapolis and Lime only operates in St. Paul"	I'm not sure where to get better data on this as I struggled to find anything just now when I tried to find information ... however, the city of Owatonna has also implemented Bird scooters and I suspect other cities in Minnesota have as well. Perhaps a comment to the effect of 'scooter shares are becoming more prevalent in greater Minnesota as well?'	Content	Transportation Options	SMTP items to edit	Content edited. "Services like Bird, Lyft and Lime are primarily operate in the Twin Cities area and are becoming more prevalent in Greater Minnesota."
310	Chapter 1, Minnesota GO Vision, Figure 1-1: "Enhances and supports Minnesota's role in a globally competitive economy as well as the international significance and connections of Minnesota's trade centers."	It's well high time to abandon this goal of economic "competitiveness." That has led to a bizarre distribution of wealth and overall poor outcomes for Americans. In its place, I'd use "globally and locally sustainable economy." Our economy should never be approached as a zero-sum game as it is now.	Content	Other	None	No changes made. The language in the SMTP reflects the Minnesota GO Vision as it was developed in 2011. These comments will be shared with staff at which time the Minnesota GO Vision is updated.
311	Chapter 2, Existing Transportation System: "Carsharing Two services (HOURCAR and Zipcar) operating in Minneapolis, St. Paul, Winona and Mankato"	Evie Carshare (www.eviecarshare.com) is related to Hourcar but is a new all-electric carshare and should be listed as such.	Content	Transportation Options	SMTP items to edit	Edited table content to read: Two services (HOURCAR—which operates Evie—and Zipcar) operating in Minneapolis, St. Paul, Winona and Mankato
312	Chapter 2, Intercity Bus & Rail Passenger Services	A rail line from Duluth to the twin cities would be great!	Content	Transportation Options	None	No changes made. The SMTP does not list specific projects. This feedback will be shared with the Office of Freight and Commercial Vehicle Operations.

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313	Chapter 2, Highway Reliability & Congestion: "Since 2013, the reliability of Minnesota's Interstate system has remained relatively consistent at both the statewide and Twin Cities area levels (see Figure 2-8 and Figure 2-9). The statewide Interstate reliability measures tend to be higher (more reliable) than the metro measures since the metro area tends to experience higher traffic volumes and congestion levels. For most of the years between 2017-2020, the Interstate has been less reliable compared to NHS for both the statewide and Twin Cities areas. Due to the COVID-19 pandemic, reliability was considerably better since fewer people were traveling and there was rarely congestion."	Interstate Highways do not belong within urban city limits, and therefore the congestion measure should not figure into route planning and highway expansion, especially in Minneapolis and Saint Paul. Reroute Interstate traffic to suburban and rural highways.	Content	Congestion	None	No changes made. Congestion impacts reliability for people and businesses using the highway system as well as the health of people and the environment. Monitoring congestion will continue to have a role in transportation decision making. System Stewardship and Healthy Equity Communities in Chapter 5 has actions to right-size the system and redesign the system to improve health for people and the environment.
314	Chapter 6, 2022-2027 Work Plan, Climate Action & Public Health: "Transition MnDOT's fleet to zero emission vehicles. MnDOT owns hundreds of light, medium and heavy duty vehicles. MnDOT has already started to transition the light and medium duty vehicles to zero emission vehicles (ZEV) options and will continue to do so. MnDOT is also exploring options for heavy duty vehicles. MnDOT will be a leader in the state enterprise by encouraging all state departments and agencies to transition to zero emission fleets. Related objectives: Climate Action, Healthy Equitable Communities"	This is a great goal that I hope is done in a timely manner	Content	Climate	None	No changes made.
315	Chapter 2, Intercity Bus & Rail Passenger Services	The TC-Duluth route should be a priority.	Content	Transportation Options	None	No changes made. The SMTP does not list specific projects. This feedback will be shared with the Office of Freight and Commercial Vehicle Operations.
316	Chapter 3, Environment: "The transportation system can have significant short- and long-term impacts on people and communities. In Minnesota, the transportation sector is a leading source of air pollution, with on-road vehicles and other mobility equipment accounting for about half of overall air pollution emissions. Fine particles and other toxins from industrial activity and transportation can negatively affect human health at all levels. Air pollution is estimated to be a major contributor to 3,200 to 6,400 deaths a year in Minnesota. Historically, the benefits and burdens of transportation have not been distributed equitably. The Minnesota Pollution Control Agency estimates that 91% of BIPOC communities have air pollution-related risks above health guidelines, compared to 46% for low-income communities and 32% for the statewide average."	We mention that air pollution is a major contributor to up to 6,400 deaths...can we also state the number of deaths for which it is a minor contributor?  I'd also like to see the amount of transportation-related medical cost statewide, from crashes and air pollution.	Content	Climate, Equity	None	No changes made. The science is not clear on when air pollution is a minor contributor. More information is available in the Air Quality Trend in the Minnesota GO trend library.
317	Chapter 3, Technology: "Technology is also changing the way people get from one point to another. People are now using internet and smartphones to hail rides, compare transportation options and rent cars, bikes and scooters. Transportation services and resources that are shared by users are known as "shared mobility." These services can be used concurrently or one after another. Shared mobility includes services such as public transit, micromobility (bikeshare and scooter share), automobile-based services (carshare and rideshare) and commute modes such as car or vanpooling. Many of these services are improved by or rely entirely on technology to work."	I wish you'd call "rideshare" "ride-hailing." Rideshare gets mixed up with carpooling.	Wording	Transportation Options	None	No changes made. "Ridesharing" is a more inclusive term. It applies in situation in which riders share a ride in a carpool, but it also applies to shared rides like UberPool and LyftShared.
318	Chapter 3 Technology: "Connected and automated vehicle (CAV) technology especially requires communications and other digital infrastructure to function properly. Connected vehicles can provide information and alerts to drivers and other vehicles to reduce crashes, improve traffic flow and save energy. Highly automated vehicles may not have a steering wheel or a human driver. However, fully "driverless" vehicles are not anticipated to be on streets for many years. Partially automated vehicles are already on Minnesota roads, with companies developing new advancements every day."	Partially automated vehicles are already on our roads, but they are test vehicles with safety personnel/drivers on board. Does this paragraph merit inclusion, or should it be rewritten to appropriately minimize the future of CAV?	Content	Transportation Options	None	No changes made. Transportation will become increasingly connected by technology. Many questions still remain on how CAV will impact society. This is why it is important to consider the implications of this technology when planning for the future of transportation. In many instances, private corporations are developing CAV technology. Government plays a key role in the implementation and regulation of new technologies like CAV.
319	Chapter 3, Technology: "As transportation becomes increasingly connected by technology, data is getting larger and more complex. These datasets are sometimes referred to as big data, defined as data gathered from devices like smartphones and services like online shopping. The breadth of big data creates opportunities to reimagine how people live. Big data helps the healthcare system understand how treatments and procedures impact patient populations. Retailers use big data to better target customers and to suggest products to consumers. MnDOT uses big data to maintain roads and bridges, understand travel patterns and improve safety."	Please include something here about traveler data security and data privacy. People probably don't think about who collects their mobility data. If it's MnDOT (via data partners, such as StreetLight), they should know that and have an option to opt out of being followed.	Content	Other	None	No changes made. MnDOT uses a number of providers for transportation analytics like StreetLight. StreetLight, not MnDOT, collects that data. More information on data privacy is available in the Big Data and Cybersecurity Trend in the Minnesota GO trend library.
320	Chapter 3, Safety: "While pedestrian and bicyclist deaths are down slightly from earlier peaks, there has been a backslide in recent years. Now more Americans are dying on foot or bicycle than any year since 1990. In 2021 in Minnesota, 64 of 488 roadway deaths were people walking or bicycling. As seen in Figure 3-2, pedestrian death rates by race and ethnicity are similar to national trends, although lower overall. American Indians had the highest pedestrian death rate per 100,000 people in both Minnesota and the United States. Black people had the second highest rate of pedestrian deaths, with 2.4 pedestrian deaths per 100,000 people in Minnesota and 3.0 pedestrian deaths per 100,000 people in the United States. Transportation safety is a top priority for Minnesota and applies to all people who use the transportation system regardless of their mode of travel. A one-size-fits-all approach does not work for transportation safety."	Here, again, we talk about death but not injury, and injuries are extremely costly to Minnesotans, both physically and financially. Also, it would be helpful to separate out the cause of injurious or deadly crashes. Can we say how many were likely caused by drugs/alcohol impairment? How about by driver sex? Are men causing these problems, and if so, wouldn't that be an important data point? After all, if it's men causing the problem, then we could tailor the solution to their specific sex/gender pathologies.	Content	Safety	None	No changes made. Please reference the Office of Traffic Safety's Crash Data Reports. It breaks out information regarding the following: alcohol, seat belt use, motorcycles, trucks, pedestrians, bicycles, school buses and trains. Demographics for people involved in crashes are often not available and based on observation and not self-reported.

ID	Chapter or Appendix	Comment	Type	Category	Action	Response
321	Chapter 6, 2022-2027 Work Plan, Transportation Safety: "Expand efforts to ensure safe speeds. 2021 was the deadliest year on Minnesota's roads in over a decade due in part to reckless driving including high speeds. Partners, including the Department of Public Safety, have a role in decreasing speeds and improving transportation safety. Related objectives: Open Decision Making, Transportation Safety, Healthy Equitable Communities"	State law and MnDOT practices surrounding the setting of speed limits on state and county roads are a huge barrier to this goal. MnDOT and county engineers are unwilling to re-design roadways specifically for a lower speed and are unable to lower speed limits to design to. This HAS to change.	Content	Safety, Implementation	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Partners have latitude in how to implement this work in their communities.
322	Chapter 1, Focus Areas: "Equity: Decisions on policy, design and operations in the built environment and transportation system have led to inequities for underserved communities, especially Black, Indigenous and People of Color. Advancing transportation equity requires having a better understanding of how the transportation system, services and decision-making processes help or hinder the lives of people in underserved communities in Minnesota."	The equity lens that needs to be applied must be significantly broader than just a focus on race or ethnicity. Equity by socioeconomic status, by ability/disability status, and by transportation mode choice or options must also be included. You cannot allocate the vast majority of public funding for car-centric infrastructure and expect to meaningfully achieve equity by mode or ability or socioeconomic status. There is already a significant percentage of the population that does not (or cannot) drive a motor-vehicle. This percentage will increase over the next decades as our population ages, as the costs of owning and operating a motor-vehicle continue to skyrocket, and as other, more affordable modes of transportation become more feasible (look at what has happened in the past 5 years with e-bikes and scooters). Failing to acknowledge this current inequity, and failing to plan for less car-dominance in the future are inconsistent with a genuine equity focus.	Content	Equity, Transportation Options	None	No changes made. MnDOT's Transportation Equity Statement of Commitment includes BIPOC, people with disabilities and other underserved communities that have historically carried disproportionate burdens of transportation decisions.
323	Chapter 1, Focus Areas: "Safety: Recent shifts in transportation behavior have led to a significant step backwards in transportation safety. 2021 was the deadliest year on Minnesota roads in more than a decade. A mix of traditional and new practices and methodologies are needed to prevent and mitigate human error and ensure people are safe."	Punching down at individual road users, particularly vulnerable road-users is a tried and true strategy of DoT's throughout the US. Knock it off. Stop telling people it's their individual responsibility to behave more safely, and start designing our transportation infrastructure in a way that implements a Safe-Systems approach. Stop designing for car-dominance/dependence, and start designing for safety.	Content	Safety, Implementation	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0.
324	Chapter 5, Critical Connections Objective Performance Measures, Table 5-5: "Air Transportation Annual number of available seat miles offered from commercial service airports 24.3 (2019) 12.6 (2020) (in millions) Increasing Support Number and trend"	This is ironic with so much focus on how much damage we've done to the planet, to want increasing air travel miles.	Content	Climate, Environment	None	No changes made. The SMTP has to balancing competing priorities and there are often times commitments in one area will conflict with other commitments in the plan. Moving people and goods by air is a critical piece of Minnesota's transportation system. Industry innovators are exploring options to reduce environmental impacts while supporting economic opportunities.
325	Chapter 3, Transportation Behavior: "Since 2020, traffic volumes have returned to or exceed pre-pandemic levels in most of the state. Recent evidence from traffic volume data in the Twin Cities suggests that while daily volumes are rebounding to near pre-pandemic levels, the distribution of trips throughout the day is different. It is yet to be determined what near- and long-term VMT trends could look like and can be influenced by transportation and economic recovery efforts following the pandemic."	In order to meet targets for GHG reductions that will prevent further atmospheric warming above 1.5C, our targets for reductions in VMT must be more aggressive than those that have been discussed to date. 20% overall reductions are simply not going to be sufficient. MNDOT must become more serious about reducing VMTs and reducing highway lane-miles to as great an extent as possible. Addition of highway lane-miles anywhere in the state should be completely off the table, but absolutely in the metro area.	Target	Climate, Implementation	None	No changes made. MnDOT will evaluate the target in five years. In the meantime, we will continue to collaborate with partners on VMT reduction implementation statewide.
326	Chapter 2, Traffic Safety Figure 2-6: Traffic fatalities on Minnesota roads, 2010 to 2021	Interesting despite the steep drop in VMT traveled in 2020, roads were even more dangerous than the year before. MnDOT's infrastructure design is failing to keep people safe.	Content	Safety	None	No changes made. The 2022 SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0.
327	Chapter 2 - Vehicle Miles Traveled: "Minnesota's roadway network has changed over time to meet the needs of those who use it. From 1992 to 2018, VMT growth on all roads in Minnesota averaged about 1.4% per year. From 2000 to 2019, overall statewide total VMT rose approximately 16.5%, from 52.1 billion VMT to 60.7 billion VMT. However, statewide VMT saw a slight reduction by 1% from 2018 to 2019 per capita. Due to the COVID-19 pandemic, 2020 saw an unprecedented drop in VMT throughout the state. In the early months of the pandemic, the volume of vehicles on Minnesota roadways dropped in some areas by 30% to 50%. This drop in VMT is shown in Figure 2-2."	VMT figures (at least estimates) are available for 2021, so it feels intentionally misleading to present this figure with data only through the anomalous 2020.	Content	Transportation Options	SMTP items to edit	Content edited. The intent was to provide data that we have for the past twenty years. Language describes the uniqueness of 2020 and what has been happening since then. Additionally, this is the best available data at the time of the 2022 SMTP development. For final 2022 SMTP, staff will include 2021 data if available.
328	Chapter 2 - Traffic Safety: "2021 was the deadliest year on Minnesota's roads in over a decade. In total, preliminary reports from the Minnesota Department of Public Safety state that in 2021, 488 people lost their lives due to motor vehicle crashes compared to 394 fatalities in 2020, a 24% increase (Figure 2-6). Note that 2021 numbers are preliminary and are subject to change when the Crash Facts report is published later in 2022. This includes any crash involving a motor vehicle. The number of serious injuries on the roadway system increased from 1,569 in 2020 to 1,722 in 2021. Overall, the total number of serious injuries has generally trended down over the past six years."	"lost their lives" is a great example of the kind of passive-voice that is so often used to avoid attributing agency and blame to motor-vehicle drivers who kill and injure others. State this plainly. In 2021, 488 people were killed in motor-vehicle crashes in Minnesota.	Wording	Safety	SMTP items to edit	Content being edited. "In total, preliminary reports from the Minnesota Department of Public Safety state that in 2021, 488 people died due to motor vehicle crashes compared to 394 fatalities in 2020, a 24% increase (Figure 2-6)."
329	Chapter 5, Title page "How will we guide ourselves moving forward?"	The lack of any mention in this plan of the FHWA's "Safe Systems Approach" is truly unfortunate, and calls into question the seriousness with which objectives and performance will be guided by any structured, systematic approach here. It also means that this plan will already be behind the curve the moment it is put in place. <a href="https://safety.fhwa.dot.gov/zerodeaths/docs/FHWA_SafeSystem_Brochure_e_V9_508_200717.pdf">https://safety.fhwa.dot.gov/zerodeaths/docs/FHWA_SafeSystem_Brochure_e_V9_508_200717.pdf</a>	Content	Safety, Implementation	None	No changes made. SMTP makes a commitment to building a culture of safety and implementing a "Safe System" approach which will improve safety for all people traveling by any mode. The Safe System approach makes a commitment to reach zero deaths and is focused around a people-centered, holistic approach to transportation safety. Additionally, in Chapter 5 Transportation Safety objective, both the fatality and serious injury performance measures have a target of 0. The 2022 SMTP also added Safe System as a key outcome for Health in the Executive Summary.