

Response to Comments

OVERVIEW

The Minnesota Department of Transportation released the draft Statewide Multimodal Transportation Plan for formal public review and comment on August 29, 2016. The draft 20-year Minnesota State Highway Investment Plan and draft Greater Minnesota Transit Investment Plan were also released for public review and comment at the same time. The comment period closed on October 14, 2016. The public comment period was advertised in the state register, through press releases, social media and at nine in-person events around Minnesota. A formal public hearing was held on October 6, 2016 from 4:00 pm to 6:00 pm. This document summarizes the comments received throughout this process and provides the Minnesota Department of Transportation’s responses to each point of feedback.

The comments received during the public comment period were organized and responded to by theme. A list of the common themes is included in the **Summary of Themes** section of this document. To help track comments, each commenter was assigned a unique identification number. Every comment associated with the commenter was also assigned a number. Some comments received included multiple themes. In these cases, the broader comment was split into individual comments by theme and each portion was assigned an identification number. For example, if commenter number 100 had three themes within his or her broader comment, these individual comments would be identified as 100.01, 100.02 and 100.03. A full list of the commenters and their associated comments is located in the **Summary of Commenters** section of this report. Complete copies of formal letters submitted through the public review and comment process are included in **Appendix A** of this document.

The final Statewide Multimodal Transportation Plan, inclusive of the changes made from public review and comment, can be read at www.MinnesotaGO.org.

SUMMARY OF THEMES

The following list highlights the common comment themes. It also identifies the where in this document the comments and responses are located by theme.

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Passenger & Freight Rail.....	48

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SUMMARY OF DOCUMENT EDITS

The following list highlights the edits made to the draft Statewide Multimodal Transportation Plan document. More information and rationale for the edits is included in the [Comments & Responses](#) section of this report.

- Executive Summary document created
- Page 6: Clarifying language added to the definition of regional partners
- Page 16: Nice Ride Bemidji removed from the at-a-glance table
- Page 19: Language added to clarify that safety data includes crashes involving motor-vehicles and bicyclists and pedestrians
- Page 22: Text updated with Minneapolis bicycle use data through 2015
- Page 22: Bicyclist and pedestrian crash numbers updated with 2015 data and bicycle and pedestrian added
- Page 56: Language added to include the total number of responses during Phase 1 engagement
- Page 85: Year 2037 removed from ADA target statement
- Page 84: Language added to the What This Is About section of the Critical Connections objective related to first- and last-mile connections for transit users
- Pages 84, 87, 88, 98, 100: Text edited to remove jargon
- Page 96: The salt use in snow and ice control performance measure moved from the list of proposed performance measures to the list of Healthy Communities measures.
- Page 105: Language added to clarify “all highway assets”
- Page 107: A new work plan item added to “study and work with transportation partners to prepare for connected and autonomous vehicles.”
- Page 151: Edits made to Appendix D to clarify the full scope of engagement activities and participants.
- Page 151: Appendix D updated to include activities completed since the draft plan was released.
- Page 219: Additional discussion related to racial disparities added to Appendix E
- Entire document: Typos and formatting errors corrected

Additionally, MnDOT and other transportation partners did not stop working between the release of the draft plan in August 2016 and final adoption. As such, MnDOT made some edits to keep the plan up-to-date. These edits are listed below for transparency. However, they were not in response to specific comments received.

- Page 16: North Star Route added to the table. Total mileage for National and State Designated Bicycle Routes increased to 1,133. The new bicycle route was designated in December 2016. Similar tables updated on pages 35 and 141.
- Page 16: Car2Go removed from list of carsharing providers. In November 2016, Car2Go announced suspension of service in Minnesota after December 2016.
- Page 16: “Ridesharing” changed to “Ride-hailing” to reflect AP style guide.
- Page 22: Language added to reflect the addition of the North Star Route. The new bicycle route was designated in December 2016.
- Page 23: Bicycle map updated to include the North Star Route. The new bicycle route was designated in December 2016.
- Page 52: Figure 3-7 updated to reflect guidance from the Federal Automated Vehicles Policy.
- Page 74: Target of 90% added to the percentage of MnDOT construction projects let in the year scheduled performance measure. Additional performance measure development work was completed by MnDOT after the draft plan was released for public review and comment.
- Page 91: Target of 80% added to the percentage of routine culvert inspections completed on time performance measure. Additional performance measure development work was completed by MnDOT after the draft plan was released for public review and comment.
- Page 91: “No target” changed to target “to be determined” for the percentage of bridges with posted weight restrictions performance measure. Additional performance measure development work was completed by MnDOT after the draft plan was released for public review and comment.
- Page 96: Unit of measurement for the greenhouse gas measure changed to tons of CO2 equivalent, from metric tons, to be consistent with the Minnesota Pollution Control Agency.
- Page 96: Measure language for the LED measure updated to add clarity. New measure reads “total percentage of light fixtures using LED luminaries on MnDOT roadways.”
- Page 96: Measure language for the native seeds measure updated to add clarity. New measure reads “total percentage of acres planted with native seeds on MnDOT projects.”
- Page 96: “No target” changed to target “to be determined” for the native seeds measure. Additional performance measure development work was completed by MnDOT after the draft plan was released for public review and comment.

LIST OF COMMENTERS

In total, comments related to the draft Statewide Multimodal Transportation Plan were received from more than 130 individuals and organizations. Names and organizations appear as provided by the individual commenters. The following table identifies each commenter and their unique identification number. The commenter identification number can be used to track individual comments and responses in the [Comments & Responses](#) section of this document. To make tracking comments as easy as possible, the following table also includes the page references for where a commenter’s individual comments can be found within this document.

Commenter ID	Name / Organization	Page Reference for Comments
109	Aaron Klemz	16, 18, 20, 26, 41, 43, 59, 62

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Commenter ID	Name / Organization	Page Reference for Comments
25	Alex Cecchini	16, 18, 20, 23, 26, 41, 43, 59, 62
129	Alexis Pennie	16, 18, 20, 26, 41, 43, 59, 62
41	Alexis Pennie - North Minneapolis Bike-Ped Advocacy Council	11, 39
99	Alison Link	16, 18, 20, 26, 41, 43, 59, 62
103	Amy Cusick	16, 18, 20, 26, 41, 43, 59, 62
12	Amy Delbecq	22, 23
56	Amy Lafrance	16, 18, 20, 26, 41, 43, 59, 62
106	Andrew Kintop	16, 18, 20, 26, 41, 43, 59, 62
61	Ann Lee	16, 18, 20, 26, 41, 43, 59, 62
50	Anonymous	49
57	Arielle Johnson	16, 18, 20, 26, 41, 43, 59, 62
81	Barbara Norblom	16, 18, 20, 26, 41, 43, 59, 62
70	Barbara Stamp	16, 18, 20, 26, 41, 43, 59, 62
8	Ben Pofahl	49
33	Beth Kingdon	4
44	Betty Hiller - Minnesota Department of Health	24
10	Bob Bollenbeck	9
20	Brendon Slotterback	13, 32
1	Brett Cease	28
93	Brian Hunke	16, 18, 20, 26, 41, 43, 59, 62
90	Bruce Howard	16, 18, 20, 26, 41, 43, 59, 62
111	C. John Hildebrand	16, 18, 20, 26, 41, 43, 59, 62
120	Carol Cooley	16, 18, 20, 26, 41, 43, 59, 62
73	Carolyn Pennisi	16, 18, 20, 26, 41, 43, 59, 62
98	Carrie Alkins	16, 18, 20, 26, 41, 43, 59, 62
123	Christine Popowski	16, 18, 20, 26, 41, 43, 59, 62
48	City of Minneapolis Staff	61, 64, 65, 66, 68, 69, 71, 72, 73, 74, 75, 76
64	CJ Bahan	16, 18, 20, 26, 41, 43, 59, 62

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63	Claire Todd	16, 18, 20, 26, 41, 43, 59, 62
9	D	29, 30, 44
4	Dan Smith - Midwest Auto Brokers, Inc.	52
92	Daniel Miller	16, 18, 20, 26, 41, 43, 59, 62
119	David Thomas	16, 18, 20, 26, 41, 43, 59, 62
132	Dennis Fernkes – Edina resident	25
71	Dennis Hauck	16, 18, 20, 26, 41, 43, 59, 62
87	Dick Bolan	16, 18, 20, 26, 41, 43, 59, 62
100	Doreen Kloehn	16, 18, 20, 26, 41, 43, 59, 62
127	Dwight Fellman	16, 18, 20, 26, 41, 43, 59, 62
16	Eamon Flynn - Minnesota Department of Health	66
78	Elaine Rider	16, 18, 20, 26, 41, 43, 59, 62
67	Elizabeth Lemke	16, 18, 20, 26, 41, 43, 59, 62
60	Ella Rausch	16, 18, 20, 26, 41, 43, 59, 62
117	Ellen Uhrich	16, 18, 20, 26, 41, 43, 59, 62
58	Erin Lynch	16, 18, 20, 26, 41, 43, 59, 62
39	Federal Highway Administration	13, 27, 51, 56, 60, 63
34	Federal Transit Administration	23, 27, 33, 38, 41, 47, 51, 60, 69
35	Hennepin County Staff	9, 10, 22, 28, 33, 35, 36, 39, 43, 46, 54, 58, 61, 64, 66, 67, 68, 69, 70, 71, 72, 73, 74, 77
28	Jack Barbier	49
15	Jason Gottfried - Hennepin County	26, 66, 70
125	Jason Wittak	16, 18, 20, 26, 41, 43, 59, 62
82	Jeanette Sobania	16, 18, 20, 26, 41, 43, 59, 62
128	Jennifer Harmening Thiede	16, 18, 20, 26, 41, 43, 59, 62
97	Jennifer Jordan	16, 18, 20, 26, 41, 43, 59, 62
122	Jennifer Tuder	16, 18, 20, 26, 41, 43, 59, 62
107	Jesse Arvidson	16, 18, 20, 26, 41, 43, 59, 62
116	Jessica Ward-Denison	16, 18, 20, 26, 41, 43, 59, 62

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101	Jill Uecker	16, 18, 20, 26, 41, 43, 59, 62
18	Joe Scott	32, 64
31	Joel Clemmer	15, 17, 48
11	John Isma	14, 21
94	John Siekmeier	16, 18, 20, 26, 41, 43, 59, 62
72	Juliann Rule	16, 18, 20, 26, 41, 43, 59, 62
86	Karen Rosar	16, 18, 20, 26, 41, 43, 59, 62
43	Karen Soderberg - Minneapolis resident	31
59	Kari Williams	16, 18, 20, 26, 41, 43, 59, 62
80	Kathleen Murphy	16, 18, 20, 26, 41, 43, 59, 62
53	Kathy Ahlers	16, 18, 20, 26, 41, 43, 59, 62
95	Kelly Zimmerscheid	16, 18, 20, 26, 41, 43, 59, 62
22	Ken Prom	53
29	Kevin Kirsch	15, 20, 62
27	Kurt Franke	14
102	Kyle Anderson	16, 18, 20, 26, 41, 43, 59, 62
68	Lisa Bergerud	16, 18, 20, 26, 41, 43, 59, 62
19	Lori Kampa	24, 52
91	Luke Van Santen	16, 18, 20, 26, 41, 43, 59, 62
130	Manitoba Infrastructure	55
42	Margaret Schuster - Minneapolis Health Department and private citizen	15, 40, 66
79	Marissa Sotos	16, 18, 20, 26, 41, 43, 59, 62
7	Mark	19, 24, 52, 60, 61
75	Mark Snyder	16, 18, 20, 26, 41, 43, 59, 62
24	Marsha Jones	48, 63
126	Mary Lutz	16, 18, 20, 26, 41, 43, 59, 62
114	Melissa Hansen	16, 18, 20, 26, 41, 43, 59, 62
76	Michael Sonn	16, 18, 20, 26, 41, 43, 59, 62

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Commenter ID	Name / Organization	Page Reference for Comments
96	Michael Tracy	16, 18, 20, 26, 41, 43, 59, 62
124	Mick Jost	16, 18, 20, 26, 41, 43, 59, 62
51	Micky McGilligan	16, 18, 20, 26, 41, 43, 59, 62
74	Mike Ferguson	16, 18, 20, 26, 41, 43, 59, 62
133	Minnesota Department of Agriculture	56
47	Minnesota Department of Health	9, 43, 58, 60
38	Minnesota Pollution Control Agency	9, 10, 14, 23, 28, 32, 33, 35, 36, 37, 38, 54, 60
45	Minnesota State Council on Disability	11, 12, 25
21	Nancy Miller	50
14	Nick	25
37	Noel Gageby - Minnesota Department of Health	15
36	Patricia McLoone	49
69	Paul Robison	16, 18, 20, 26, 41, 43, 59, 62
23	Peggy Sammons	42
55	Peter Doughty	16, 18, 20, 26, 41, 43, 59, 62
32	Rick Bosacker	16
121	Rob Jackson	16, 18, 20, 26, 41, 43, 59, 62
65	Robert Selton	16, 18, 20, 26, 41, 43, 59, 62
13	Roger Johnson - Candidate for the MN State Senate (35)	57, 64
131	Ron Karlen	49
3	Ronald Johannsen - Farmer, Rural America needs rails.	14, 17, 48, 52
105	Ronald Williams	16, 18, 20, 26, 41, 43, 59, 62
52	Ronda Kisner	16, 18, 20, 26, 41, 43, 59, 62
83	Rosalie Pierce-Martin	16, 18, 20, 26, 41, 43, 59, 62
77	Roxanne Kimball	16, 18, 20, 26, 41, 43, 59, 62
17	S. Viker	24
2	Sally Rousse	9, 25, 39, 58
85	Scott Torvi	16, 18, 20, 26, 41, 43, 59, 62
110	Shaina Brassard	16, 18, 20, 26, 41, 43, 59, 62

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Commenter ID	Name / Organization	Page Reference for Comments
54	Steve Gjerdingen	16, 18, 20, 26, 41, 43, 59, 62
118	Susan Elsner	16, 18, 20, 26, 41, 43, 59, 62
88	Suzanne Hansen	16, 18, 20, 26, 41, 43, 59, 62
113	Suzi Johnson	16, 18, 20, 26, 41, 43, 59, 62
5	Terrence Nayas	14
104	Tim Brausen	16, 18, 20, 26, 41, 43, 59, 62
30	Todd Eddy	17, 20
6	Todd McGonagle	24, 49
89	Tom Mundahl	16, 18, 20, 26, 41, 43, 59, 62
49	Transit for Livable Communities	10, 18, 20, 21, 34, 41, 48, 51, 52, 53, 62, 69
84	Tyler Teggatz	16, 18, 20, 26, 41, 43, 59, 62
26	Val Escher	17
108	Wanda Ballentine	16, 18, 20, 26, 41, 43, 59, 62
46	Washington County	54
66	William Blair	16, 18, 20, 26, 41, 43, 59, 62
62	Zachary Rakke	16, 18, 20, 26, 41, 43, 59, 62
40	Zack Mensinger	14, 15, 22, 24, 27

COMMENTS & REPONSES

The following sections include original comments received and MnDOT's response by theme. The responses call out when changes were made to the draft plan.

General Plan Direction

GENERAL SUPPORT FOR THE PLAN DIRECTION

Comments

GENERAL SUPPORT FOR THE OPEN DECISION-MAKING OBJECTIVE

Comment ID	Name / Organization	Comment
2.04	Sally Rouse	I am exciting for Open Decision Making! This was not present in the 16 years I have been following the Mass Transit LRT issue. Meetings were cancels, processes changed, there has been bullying by top lawmakers, manipulations, caving, secret meetings, last minute unreasonable amendments, and last Thursday four people were ushered into a meeting and asked to speak out for a transit line that they don't even understand or will serve them. They were used. So, transparency would be welcome and clean budgets, too!
35.47	Hennepin County Staff	Page 102: We support overall movement towards 'Open decision-making. This will in theory reduce politicization of project selection and a more technocratic and meritorious process. Public support will recognize these efforts if successful.
38.13	Minnesota Pollution Control Agency	We hope that MnDOT will commit to continued efforts at meaningful engagement with all Minnesotans, with particular emphasis on reaching communities historically left out of decision-making processes, especially low-income communities, communities of color, and Tribes and tribal members. The MPCA is striving to improve our own efforts at reaching these populations, hearing their concerns, and including their voices in our decision-making processes. It is critical that all state agencies actively seek to provide meaningful opportunities for Minnesotans to be involved in the decisions that impact their lives.
47.07	Minnesota Department of Health	Going forward, it is important that MnDOT nurture these relationships and continue the conversation. Whether the use of contractors to undertake public engagement initiatives helps or hinders the continued development of these relationships may warrant further internal discussions.

GENERAL SUPPORT FOR THE TRANSPORTATION SAFETY OBJECTIVE

Comment ID	Name / Organization	Comment
10.01	Bob Bollenbeck	good plan. I liked the Traveler Safety info.

GENERAL SUPPORT FOR HEALTHY COMMUNITIES STRATEGIES

Comment ID	Name / Organization	Comment
49.05	Transit for Livable Communities	Where we agree...The emphasis on complete streets. MnDOT is committed to the principles of complete streets. The agency has a policy that complete streets be considered in all projects along the state highway system. Partner agencies are encouraged to formally adopt a complete streets approach.(pg. 98),
35.46	Hennepin County Staff	Page 100: Support and encourage the narrative shift to person throughput over vehicle throughput. I would expect this language to be represented in any/all of MnDOT funding solicitation applications
38.02	Minnesota Pollution Control Agency	The Minnesota Pollution Control Agency (MPCA) appreciates the many opportunities the Minnesota Department of Transportation (MnDOT) gave us to provide input on the August 2016 Drafts of the Minnesota State Transportation Plans (Plans). We also commend MnDOT for improvements made during the drafting process to address issues where the MPCA has regulatory responsibility and other interests, including:...Considering the connection between land use and transportation early in project development; Prioritizing transit investments in areas where infrastructure and development patterns are in place, committed to, or in development to support successful transit systems, by balancing transit ridership with added connectivity
49.04	Transit for Livable Communities	Where we agree...Giving higher priority to transportation improvements in areas with complementary existing or planned land uses. Local parking policies can also be adjusted to rely on market-based strategies to ensure balanced supply and demand for parking. (pg. 97)

Response

Thank you for your comments.

SUMMARY OF DOCUMENT EDITS

- No changes made

OVERALL PLAN PRIORITIES ARE UNCLEAR

Comments

Comment ID	Name / Organization	Comment
49.08	Transit for Livable Communities	The overall priorities of the plan are not clear. The SMTP identifies overarching guidance and priorities for the entire transportation system (pg. 6). What are the priorities? What is the overarching guidance given the plan includes no prioritization or clear accountability for the 45 strategies listed?

Response

The policy direction in the Statewide Multimodal Transportation Plan consists of five key objectives – Open Decision-Making, Transportation Safety, Critical Connection, System Stewardship and Healthy Communities. Each objective includes related strategies and performance measures that help track progress toward the objective at a statewide level. As a statewide plan for all types of transportation and all transportation partners, the SMTP is inherently a very broad document. Its goal is to provide high-level direction to guide additional transportation planning and decision points. For example, MnDOT’s modal and system plans and plans from local partners help to further clarify, prioritize and measure the SMTP policy direction.

SUMMARY OF DOCUMENT EDITS

- No changes made

Accessibility

MORE EMPHASIS ON ACCESSIBILITY IS NEEDED

Comments

Comment ID	Name / Organization	Comment
41.02	Alexis Pennie - North Minneapolis Bike-Ped Advocacy Council	Further, ADA must be taken seriously as well. MND continues to delay and procrastinate ADA upgrades although the law was passed in 1990, MND is only starting to rectify years of noncompliance. As MLK said, Justice delayed is justice denied.
45.01	Minnesota State Council on Disability	The Minnesota State Council on Disability (MSCOD) was established in 1973 to advise the governor, state agencies, state legislature, and the public on disability policy. MSCOD advocates for policies and programs that advance the rights of Minnesotans with disabilities. The quality of life of limited-mobility Minnesotans with disabilities depends on the availability of transportation options. As such, we appreciate the opportunity to give input into the Department of Transportation’s strategic plans. Having reviewed the proposed strategic plan, MSCOD feels that the Department of Transportation needs to go even further in making accessibility for Minnesotans with disabilities a core, foundational priority for all future planning. The Statewide Multimodal Transit Plan rightly identifies the demographic trend of an aging population and a correlative rise in the rate of disability in Minnesota, but fails to connect this to ensconcing accessibility as a core design principle. It is impossible to overstate the need for access to these services for all Minnesotans. Furthermore, as the Department of Transportation plans for the coming years, MSCOD hopes it will tighten the timeline of the ADA Transition Plan. We cannot afford to wait another 10 years to fully comply with a law that has already been on the books for 26 years. People with disabilities are the largest minority group in the state and their civil rights must be respected with full access to transportation.

Response

The performance target for substantial ADA compliance of state-owned sidewalk miles should be 100% as soon as possible. The year 2037 was removed from the target statement to reflect this priority. However, the 2018 to 2037 highway investment direction still projects that 100% substantial compliance will not be achieved until 2037. This investment level was selected given current funding constraints and many difficult trade-offs (see the 20-year Minnesota State Highway Investment Plan for more information). While still not ideal, it represents a stronger commitment to accessibility than the state’s historical rate of investment, which would have taken approximately more than 50 years to reach substantial compliance. Should additional revenue become available, increased investment in accessible pedestrian infrastructure may be possible.

More broadly, accessibility of the transportation system is an important focus of the Statewide Multimodal Transportation Plan. There are multiple strategies that explicitly include a focus on ensuring critical connections are available, safe and useable for everyone, including individuals with disabilities (p.81, 87, 88, 98). As a policy document the SMTP does not codify design standards. However, current design standards are consistent with policy direction. New sidewalk miles are required to be built to ADA standards. Additionally, Chapter 6 includes a workplan item for MnDOT to review and update the Roadway Design Manual and other guidance documents, which offers an opportunity to further ensure accessibility is a core design principle.

SUMMARY OF DOCUMENT EDITS

- Page 85: Year 2037 removed from target statement

SUPPORT FOR DOCUMENT ACCESSIBILITY

Comments

Comment ID	Name / Organization	Comment
45.03	Minnesota State Council on Disability	Lastly, accessibility in transportation starts with digital accessibility in planning documents such as these. We applaud the Department of Transportation for providing accessible versions of all plans, on their website. MSCOD is always available as a resource for MnDOT and all agencies for ensuring compliance with digital accessibility guidelines in all communications with the people of this state.

Response

Digital accessibility is critical for all transportation documents. The Open Decision-Making objective (p.73) explicitly calls this out and encourages all transportation partners to make document accessibility a priority.

SUMMARY OF DOCUMENT EDITS

- No changes made

Autonomous Vehicles

MORE EMPHASIS ON AUTONOMOUS VEHICLES IS NEEDED

Comments

Comment ID	Name / Organization	Comment
20.02	Brendon Slotterback	Finally, MNDOT should begin planning for a future of autonomous, shared, electric vehicles. MNDOT should adopt a goal of moving to full autonomy for vehicles as quickly as possible, to ensure all the safety and environment benefits of these technologies is realized. However, as these technologies are brought into reality, safety and design priority should remain on non-motorized modes of travel. Thanks!
39.03	Federal Highway Administration	The SMTP notes the advent of automated/connected vehicles have the potential to reshape entire systems as they are known today. The plan further cites University of Minnesota research indicating fully autonomous vehicles will be market ready by 2025 only nine years away. Emerging research has indicated the technology has the potential to influence safety, travel time reliability, sustainability, congestion, vehicle ownership, and air quality. Considering the SMTP is a 20-year plan, and given the rapid advancement and potentially disruptive nature of this technology, the document could be improved by adding specific policies and guidance for automated/connected vehicle consideration moving forward. A few examples of concepts to explore: How will freight and the corresponding infrastructure be affected when delivery vehicles are automated and operating 24 hours a day? Given the larger size and weight of trucks, will this accelerate roadway deterioration on Minnesota's heaviest freight corridors and reduce forecasted pavement life? With the advent of self-driving vehicles, the elderly, disabled, or very young could gain access to transportation options they previous didn't have. Will congestion decrease given the automated nature of the vehicles, or increase with more of the non-driving population utilizing the technology and roadways? How can Minnesota plan for this? Automated vehicles don't speed, and are noted as being very risk-averse. Given these safety benefits, coupled with seamless merging that will stem from vehicle-to-vehicle communication, MnDOT should consider exploring the impact this will have on interchange construction. The improvements in safety may yield a reduction in the need for large, cost-prohibitive projects such as these. This would also support MnDOT's goal of building the system to a maintainable scale.

Response

The rapid development of automated vehicle technologies is one of the most significant trends in transportation. The conversation is changing quickly. Since releasing the draft plan in August, there were significant developments. For example, the National Highway Traffic Safety Administration released new policy guidance on automated vehicles. There remains significant

uncertainty in exactly when the new vehicle technology will become widespread in Minnesota and how exactly it will function in our climate. MnDOT is actively working with other transportation partners in Minnesota and nationally to prepare for the new technology. To reflect that commitment, a new work plan item was added to the plan.

SUMMARY OF DOCUMENT EDITS

- Page 107: a new work plan item was added to “study and work with transportation partners to prepare for connected and autonomous vehicles.”

Bicycling, Walking & Transit

COMMENTS ON LEVEL OF SUPPORT FOR BICYCLING, WALKING & TRANSIT

Comments

GENERAL SUPPORT FOR BICYCLING, WALKING & TRANSIT / MORE EMPHASIS ON BICYCLING, WALKING & TRANSIT IS NEEDED

Comment ID	Name / Organization	Comment
38.04	Minnesota Pollution Control Agency	The Minnesota Pollution Control Agency (MPCA) appreciates the many opportunities the Minnesota Department of Transportation (MnDOT) gave us to provide input on the August 2016 Drafts of the Minnesota State Transportation Plans (Plans). We also commend MnDOT for improvements made during the drafting process to address issues where the MPCA has regulatory responsibility and other interests, including:...Identifying and giving priority to infrastructure improvements, services, and education that increase the number of people who bicycle, walk, and take transit;
40.05	Zack Mensinger	By improving both the buses and cycling, you are also really helping promote tourism as well, because many international tourists will be used to being able to hop on a bus to get to their destination, and cycling is a common tourist activity.
5.02	Terrence Nayes	more bike trails, less pollution and congestion.
3.04	Ronald Johannsen - Farmer, Rural America needs rails.	more bus lanes in urban and city areas. More cabs, ubers.
5.01	Terrence Nayes	More light rail
11.02	John Isma	more public transport
27.01	Kurt Franke	I'm emailing today to comment on MnDOT's draft Statewide Multimodal Plan. I care about moving Minnesota's transportation future in the right direction with this plan and believe we need a greater statewide focus on transit, bicycling, and walking over the

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Comment ID	Name / Organization	Comment
		next twenty years. Thank you for taking these comments into consideration before the plan is finalized: Transit - moving people not machines. Bicycles!!! Support for Pedestrians.
29.01	Kevin Kirsch	I'm emailing to comment on MnDOT's Multimodal Plan draft. I believe the plan doesn't do a good enough job focusing on alternate modes of transportation. Namely, public transit, bicycling, and walking. Those options reflect the increasingly divergent ways people get around in the modern world and respond to the state's aging population, and addresses equity.
31.01	Joel Clemmer	The Plan should prioritize transit, passenger rail, cycling and walking. While roads and bridges continue to be important, I think our attention should be weighted to the difficult change to alternate transportation means...While transportation modes other than roads and bridges is often assumed to favor the metro, this is not necessarily so. Special transportation services for the elderly and infirm are needed, especially in greater Minnesota.
37.01	Noel Gageby - Minnesota Department of Health	This is great and all, but the state still doesn't support multi-modal transportation for its employees. Why are there not enough bike lockers? Why is Nice Ride discounts only offered to Capitol Complex employees who have given up their parking spot, why is there not a subsidy for employees who bike to work versus just using the bus?
40.02	Zack Mensinger	Especially since facilities for cycling are so much cheaper to build and maintain, it would be great to see a greater focus on these.
42.01	Margaret Schuster - Minneapolis Health Department and private citizen	The Complete Streets section falls short of providing specific health, equity, and climate reasons for adopting such a policy and framework in decision-making. Complete streets policies prioritize decisions in order of pedestrian use, transit users (bike, bus, train), and then motor vehicle users. Clear reasons for adopting this prioritization include: individual, neighborhood, and population health is impacted by gas emissions, poor air quality, and lack of opportunity for physical activity. A complete streets policy adopts a position that health is positively impacted when we move away from gas powered motor vehicles and reduce gas emissions especially in areas of high density population. Equity in a complete streets policy emphasizes that all people who choose to use, or may have to use, other transit options will have increased opportunities to do so. And lastly, a complete streets policy

Comment ID	Name / Organization	Comment
		emphasizes well-marked sidewalks and bike lanes for pedestrian and biker safety.
32.09	Rick Bosacker	I am lifelong MN resident and a physician charged with looking after the health of my communities. While much focus on well-being is on the healthcare delivery system, the greatest impact on our health is through our interaction with the built environment. While MN prides itself on its healthcare and quality of life, we are way behind many places in the world because we don't question the car-dependent society and subsequent sprawl we've created and continue to build. We've given in to uninformed, myopics and consigned ourselves to an inefficient, expensive and unhealthy built structure. 35k Americans die on our roads. 55k die due to auto pollution. 180k die due to sedentary lifestyles. These outcomes are controllable and much lower in many places as the result of the choices that government makes. This is only the health impacts. There are tremendous economic impacts as well! But, we/you have an opportunity to demonstrate the courage needed to service public good rather than public opinion if you get this right. TLC is an organization that has found this courage and I've included their well thought out requests below which comment on MnDOT's draft Statewide Multimodal Plan...As a public servant, its easiest to see your job as an administrator and arbiter of public opinion. It takes courage to implement change that sometimes goes against common opinion but it holds true to the commitment of service!
25.01, 32.01, 51.01, 52.01, 53.01, 54.01, 55.01, 56.01, 57.01, 58.01, 59.01, 60.01, 61.01, 62.01, 63.01, 64.01, 65.01, 66.01, 67.01, 68.01, 69.01, 70.01, 71.01, 72.01, 73.01, 74.01, 75.01, 76.01, 77.01, 78.01, 79.01, 80.01, 81.01, 82.01, 83.01, 84.01, 85.01, 86.01, 87.01, 88.01, 89.01, 90.01, 91.01, 92.01, 93.01, 94.01, 95.01, 96.01, 97.01, 98.01, 99.01, 100.01, 101.01, 102.01, 103.01, 104.01, 105.01, 106.01, 107.01, 108.01, 109.01,	See Summary of Commenters table	I'm emailing today to comment on MnDOT's draft Statewide Multimodal Plan. I care about moving Minnesota's transportation future in the right direction with this plan and believe we need a greater statewide focus on transit, bicycling, and walking over the next twenty years.

Statewide Multimodal Transportation Plan – January 2017

Comment ID	Name / Organization	Comment
110.01, 111.01, 113.01, 114.01, 116.01, 117.01, 118.01, 119.01, 120.01, 121.01, 122.01, 123.01, 124.01, 125.01, 126.01, 127.01, 128.01, 129.01		

DO NOT SUPPORT BICYCLING

Comment ID	Name / Organization	Comment
3.02	Ronald Johannsen - Farmer, Rural America needs rails.	Cut out all the bike lanes, ride your bikes in the basements or parks.

INCREASE FUNDING FOR BICYCLING, WALKING & TRANSIT

Comment ID	Name / Organization	Comment
26.01	Val Escher	I am disabled, self-employed, and use a bicycle to get around Minneapolis for work and personal reasons. I wish you would work to make it safe for all riders of all ages and social strata to get around safely on foot or bike. We need not only more paths and sidewalks, but to implement new technologies used by other cities to make effective intersections and transit networks. We need protected bike lanes that coincide with bus and train routes. It's short-sighted to give car routes of building state -of-the art roadways. We should encourage transit because it is cheaper, healthier, easier and more fun than using cars all the time. I am a car owner but use my bike for shopping and downtown excursions year round. I pay income and property taxes. I deserve safe roads for my car and my bike, and decent transit items like trains, buses and sidewalks.
30.01	Todd Eddy	I'm have two suggestions regarding MnDOT's draft Statewide Multimodal Plan: MnDOT should prioritize funding and policies that expand public transit, bicycling, and walking and...
31.02	Joel Clemmer	That change should be ensured by dedicated funding for alternate transportation, such as a small increase in the sales tax.

Comment ID	Name / Organization	Comment
49.02	Transit for Livable Communities	However, we think a least one key transportation strategy to advance equity is obvious and doesn't require further study: increased prioritization and funding of transit, bicycling and walking.
49.07	Transit for Livable Communities	MnDOT should explicitly prioritize funding and policies that expand public transit, bicycling, and walking. These options will reduce greenhouse gases and other emissions, expand affordable access and promote equity, and respond to the state's changing demographics. The plan includes Identify and give priority to infrastructure improvements, services and education that increase the number of people who bicycle, walk and take transit as a Healthy Communities strategy, noting that Increasing the number of people who bicycle, walk and take transit has many benefits for Minnesota's communities (pg. 100). On page 62 the plan indicates, Participants were also asked about tying different types of spending to land use considerations. Generally speaking, there was support for prioritizing bicycle and pedestrian spending and safe routes to school funding in this way. However, MnDOT's draft 20-year Minnesota State Highway Investment Plan shows a 76 percent reduction in bicycle funding vs. defined needs, leading to a deterioration of the bicycle network. Also, the draft Greater Minnesota Transit Investment Plan doesn't include a strategy for increasing the modal share of transit. Priority for transit modes could be reflected by more boldly highlighting a strategy to meet funding needs and by a more complete definition of transit needs, but the plan lacks both of these elements. In fact, the plan explicitly states that the ridership estimation model used is not intended to serve as a planning tool for designing future transit services that could influence travel choices.
49.14	Transit for Livable Communities	The plan should better highlight the need for expanded transit and bicycling options given its finding that Twin Cities residents are increasingly using options other than cars to travel (pg. 49). More specifically, several times the plan notes the need to improve multimodal transportation options (pg. 88), but insufficient connection is made to the need for increased state funding.
25.02, 32.02, 51.02, 52.02, 53.02, 54.02, 55.02, 56.02, 57.02, 58.02, 59.02, 60.02, 61.02, 62.02, 63.02, 64.02, 65.02, 66.02, 67.02, 68.02,	See Summary of Commenters table	1) MnDOT should explicitly prioritize funding and policies that expand public transit, bicycling, and walking. These options will reduce greenhouse gases and other emissions, expand affordable access and promote equity, and respond to the state's changing demographics.

Comment ID	Name / Organization	Comment
69.02, 70.02, 71.02, 72.02, 73.02, 74.02, 75.02, 76.02, 77.02, 78.02, 79.02, 80.02, 81.02, 82.02, 83.02, 84.02, 85.02, 86.02, 87.02, 88.02, 89.02, 90.02, 91.02, 92.02, 93.02, 94.02, 95.02, 96.02, 97.02, 98.02, 99.02, 100.02, 101.02, 102.02, 103.02, 104.02, 105.02, 106.02, 107.02, 108.02, 109.02, 110.02, 111.02, 113.02, 114.02, 116.02, 117.02, 118.02, 119.02, 120.02, 121.02, 122.02, 123.02, 124.02, 125.02, 126.02, 127.02, 128.02, 129.02		

DECREASE FUNDING FOR TRANSIT

Comment ID	Name / Organization	Comment
7.04	Mark	Stop diverting gasoline and license tax money to any public transportation.

Response

MnDOT remains committed to delivering a multimodal transportation system, which includes bicycling, walking and transit. MnDOT also recognizes and appreciates the role and benefits of these modes. Chapter 3 includes summary-level information of how bicycling, walking and transit relate to population, environmental, economic and transportation behavior factors and trends in Minnesota. More detailed information can be found in the reports included in MnDOT’s Trend Library at www.MinnesotaGO.org. Support for bicycling, walking and transit is demonstrated in the Critical Connections objective (pg. 85), which includes strategies to support multimodal connections and performance measures to help track the availability and reliability of connections by all modes. The Healthy Communities objective (pg. 95) also emphasizes the importance of these modes through strategies related to complete streets, reducing greenhouse gas emissions and increasing the number of people who bicycle, walk and take transit. Future planning and implementation work will determine what this overall direction means for specific projects, services and locations within Minnesota. The Statewide Multimodal Transportation Plan is a policy plan, not an investment plan. Decisions about funding levels for specific modes, projects or services are outside the scope of this plan. However, MnDOT generally supports funding decisions that are consistent with the SMTP direction and help achieve the Minnesota GO Vision.

SUMMARY OF DOCUMENT EDITS

- No changes made

NEED BETTER PERFORMANCE MEASURES & TARGETS FOR MODES OTHER THAN DRIVING

Comments

Comment ID	Name / Organization	Comment
29.02	Kevin Kirsch	I also believe MnDOT should implement better performance measures for modes other than driving. The draft put too much emphasis on the speed/delay of car travel. There are so many other modes and you don't take them into account as well as you could. If you don't measure them better, you can't know their performance.
30.02	Todd Eddy	I'm have two suggestions regarding MnDOT's draft Statewide Multimodal Plan...MnDOT should implement better performance measures for modes other than driving. Thank you for considering my comments.
25.03, 32.03, 51.03, 52.03, 53.03, 54.03, 55.03, 56.03, 57.03, 58.03, 59.03, 60.03, 61.03, 62.03, 63.03, 64.03, 65.03, 66.03, 67.03, 68.03, 69.03, 70.03, 71.03, 72.03, 73.03, 74.03, 75.03, 76.03, 77.03, 78.03, 79.03, 80.03, 81.03, 82.03, 83.03, 84.03, 85.03, 86.03, 87.03, 88.03, 89.03, 90.03, 91.03, 92.03, 93.03, 94.03, 95.03, 96.03, 97.03, 98.03, 99.03, 100.03, 101.03, 102.03, 103.03, 104.03, 105.03, 106.03, 107.03, 108.03, 109.03, 110.03, 111.03, 113.03, 114.03, 116.03, 117.03, 118.03, 119.03, 120.03, 121.03, 122.03, 123.03, 124.03, 125.03, 126.03, 127.03, 128.03, 129.03	See Summary of Commenters table	2) MnDOT should implement better performance measures for modes other than driving. The current plan continues to put too much emphasis on the speed/delay of car travel. For example, on page 85, there is no performance target for improving transit access to jobs, and MnDOT's target for state-owned sidewalk miles substantially compliant with ADA standards is 100 percent by 2037. That's over 20 years from now! Our state can and should do better.
49.09	Transit for Livable Communities	MnDOT should implement better performance measures for modes other than driving. The current plan continues to put too much emphasis on the speed/delay of car travel. For example, on page 85, there is no performance target for improving transit access to

Comment ID	Name / Organization	Comment
		jobs, and MnDOT's target for state-owned sidewalk miles substantially compliant with ADA standards is 100 percent by 2037. That's over 20 years from now! Our state can and should do better. Since 2010, the percentage of freeway miles congested during peak travel periods in the Twin Cities remained close to 20 percent, with minor fluctuations up and down (pg. 44). The plan states that whenever possible, transportation decision-makers should focus on how many people are moved by the system not how many vehicles (pg. 100) but it is unclear how funding priorities and performance measures will reflect this emphasis.
49.15	Transit for Livable Communities	We recommend adding a target to the performance measure: Average annual number of jobs accessible within a 30-minute transit commute during the a.m. peak (pg. 85). We also recommend adding a target to the performance measure: Annual percentage of MnDOT omnibus survey respondents perceiving safe environments for bicycling and walking (pg. 96).
49.16	Transit for Livable Communities	We also recommend adding a target to the performance measure: Annual percentage of MnDOT omnibus survey respondents perceiving safe environments for bicycling and walking (pg. 96).

Response

The use of performance measures in transportation planning is constantly evolving as new data becomes available and methodologies are refined. MnDOT has a long history with measures related to roadway condition and use. In many ways, measures for other systems and modes are less developed. However, MnDOT continues to look for new and better ways to track progress toward all system objectives. To this end, the Statewide Multimodal Transportation Plan identifies a number of proposed measures to be developed in the next few years (pg. 111), many of which are for modes other than driving. These proposed measures, when developed, will help tell a more complete story of Minnesota's transportation system. Additionally, not every measure currently has or will have an associated target. For some measures, the most valuable piece of information is the trend. For these measures, MnDOT tracks changes over time rather than progress toward a specific target.

SUMMARY OF DOCUMENT EDITS

- No changes made

PRIORITIZE SAFETY FOR BICYCLISTS & PEDESTRIANS

Comments

Comment ID	Name / Organization	Comment
11.01	John Isma	I think we need safer bikeway system

Comment ID	Name / Organization	Comment
12.01	Amy Delbecq	Pedestrian and bicyclist safety is my top transportation priority. We need to do more to ensure that people who choose to bike and walk feel safe, and do not have their lives continually threatened by distracted drivers.
35.40	Hennepin County Staff	Page 81: When planning for all users vulnerable modes and populations (such as pedestrians) should be given priority and special care
40.03	Zack Mensinger	While you list safety as a focus, I have seen this slip when it comes to cyclist safety. Shoulders of repaved roads often remain too narrow and rumble strips are placed in the middle of what small shoulder exists, to avoid annoying truckers. Their annoyance is my danger. I am essentially given no choice but to take the lane, which is pretty dangerous at highway speeds. Wider shoulders are especially important as more drivers are distracted by technology and even a slight drift could lead to them hitting a cyclist on a narrow shoulder. If you want to see cycling rates increase, add better infrastructure! As you cite in chapter 2, Minneapolis has seen cyclist numbers double, which is largely due to better, safer infrastructure. Increasing safe connections to existing state trails would be a good way to leverage existing infrastructure.

Response

The Transportation Safety objective (pg. 78) emphasizes the importance of safety for all modes. It includes a strategy to plan, design, build, operate and maintain transportation infrastructures and facilities to improve safety for all users. The strategy acknowledges that a safety improvement for one mode many have adverse impacts on other forms of transportation. It emphasizes the importance of considering these trade-offs in safety decision-making. Additionally, bicycle and pedestrian safety are identified as top priorities for upcoming safety education campaigns in the near-term work plan for MnDOT (pg. 103).

SUMMARY OF DOCUMENT EDITS

- No changes made

MORE EMPHASIS ON MODE SHIFT / REDUCING VEHICLE MILES TRAVELED IS NEEDED

Comments

Comment ID	Name / Organization	Comment
12.02	Amy Delbecq	We should be designing our state transportation infrastructure to encourage alternative means of transit (public, walking, biking), and making them as accessible as possible to all communities.
25.09	Alex Cecchini	MnDOT should explicitly prioritize funding and policies that expand public transit, bicycling, and walking. These options will reduce greenhouse gases and other emissions, expand affordable access and promote equity, and respond to the state's changing
34.03	Federal Transit Administration	There is no mention of Transportation Demand Management (TDM) strategies per se, and there could be an increased focus on describing policies/techniques for implementation to reduce travel demand.
34.08	Federal Transit Administration	Travel Demand Management (TDM): The plans could outline and analyze TDM strategies, including pricing methods of both personal vehicles and transit riders (e.g. congestion pricing, VMT pricing, increased taxes and fares) to quantitatively measure expected increases in revenues and reductions in travel demand by mode using known elasticities. Descriptions of implementation pathways and challenges could be provided. Charging the full amount of costs that users impose on the system, or at least higher amounts, is more optimal in the sense that the fees are considered both a cost and a benefit and do not diminish net benefits
38.08	Minnesota Pollution Control Agency	Reducing vehicle miles traveled, The Plans should clarify how MnDOT intends to achieve its stated goal of reducing vehicle miles traveled (VMT) in Minnesota. Reducing VMT is a key strategy for reducing transportation-related emissions of greenhouse gases and other air pollutants. As the state continues to grow in population and employment opportunities, efforts to reduce VMT will become even more important to combat the congestion and VMT increases that are likely to ensue without thoughtful investments in sustainable infrastructure. Achieving reductions in VMT would advance nearly all of the Plans' objectives. The MPCA fully supports this goal and its implications for land use and planning.

Response

The Statewide Multimodal Transportation Plan includes a number of strategies that support mode shift and a reduction in vehicle miles traveled. The Healthy Communities objective (pg. 95) has a strategies to better coordinate land use planning and transportation, minimize greenhouse gas emissions, and give priority to infrastructure improvement, services and education that increase the number of people who bicycle. Future planning and implementation work will determine what this overall direction means for specific projects, services and locations within Minnesota.

SUMMARY OF DOCUMENT EDITS

- No changes made

COMMENTS ON EXISTING TRANSIT SERVICE / COMMENTS ON PLANNED TRANSIT PROJECTS

Comments

Comment ID	Name / Organization	Comment
6.02	Todd McGonagle	Northstar between St. Cloud and MSP would be a much better service if, in addition to the current schedule, a train would simply bounce from MSP to St. Cloud every 2 hours. (or however long it takes one train set to make a cycle) all day long. At it is, it is impossible to use the Northstar for any evening dining, shopping or entertainment in the twin cities if you live in St. Cloud.
7.05	Mark	Cease development of useless light rail that cannot even support itself by customer patronage. Sell off existing light rail to private investors.
17.01	S. Viker	Glad you're doing this. The road congestion is horrible. Currently, many decent home-owner properties in areas that have good public transportation are expensive and unaffordable (like Mpls or St. Paul). So, many people must choose to live in 2nd ring suburbs (or farther), where there is no practical public transportation (you must first driving to a park and ride [so deal with congestion either way] and then transfer a few times to get to your destination. That's not smart commuting). Is there a workable way to provide public transportation to these areas that have lower density population than Mpls.-St. Paul, but are the reason for all the congestion?
19.01	Lori Kampa	In April of 2016 my husband and I moved from Minnetonka to rural St. Cloud. He now commutes to St. Louis Park nearly every weekday. He would love to use the rail to get there but it stops at Big Lake and apparently there are no plans to extend it. Why wouldn't you when more and more people are moving out here? When the other rail expansions are built you'll have a nice system in the cities but you still need to get people from the outer areas in to utilize it.
40.04	Zack Mensinger	Shifting gears, simple improvements like designated, clear, more pleasant stops for intercity buses could potentially help increase ridership. Now, the stops and schedules are nearly invisible unless you look for them. Plus, who wants to wait out in the cold for a bus. An enclosed shelter for each of the stops would be really beneficial.
44.01	Betty Hiller - Minnesota Department of Health	We somehow need to make busing from Golden Valley, Crystal and New hope more accessible to downtown Minneapolis and beyond. They are cut off by few buses that run not at convenient times to make connections downtown. Or bridges, roads and infrastructure has to be addressed quickly.

Comment ID	Name / Organization	Comment
2.02	Sally Rousse	SWLRT, for example, skirts these areas. Bitten Line will serve them (Harrison, Near North, North, Brooklyn Center). But if you are trying to achieve racial inequity by building an LRT to serve affluent white suburbanites who already have cars and a commuter bus, then you are achieving it. The proposed increased employment planned in Eden Prairie are primarily low wage jobs that Northsiders can obtain closer to where they live and/or don't want to travel 2 buses and LRT for. The recent FEIS uncovered that there will MORE greenhouse gases with SWLRT! The NO BUILD alternative produces fewer emissions. SWLRT is bad for climate change, according to its own FEIS. Annually, the Metro area would see 2,000 metric tons less of GHG without SWLRT.
14.01	Nick	Please don't spend the huge cost to build the Southwest light rail line. The \$1 Billion price tag is about 1 whole year of MnDOT Construction funding that could be better spent elsewhere to serve more users. Light rail user fees will never pay the operating cost so the line will be a drain on the operation budget for years to come. Also, when the system needs to be refurbished/rebuilt in 50 years where will that money come from? The cost benefit for this project simply isn't there. Please be good stewards of our tax dollars. Thank you. Nick
132.01	Dennis Fernkes	The SW light rail extension MUST be built. I support Gov. Dayton's plan to use Certificates of Participation

Response

The Statewide Multimodal Transportation Plan is a policy document that provides high-level guidance for MnDOT and other transportation partners moving forward. The plan does not include specific projects. Specific transit projects in the Twin Cities, such as the Green Line extension / Southwest light rail, the Northstar commuter rail and local bus routes, are planned by the Metropolitan Council. More information about intercity bus priorities can be found in the 2014 Minnesota Intercity Bus Study.

SUMMARY OF DOCUMENT EDITS

- No changes made

SUPPORT FOR TRANSIT COORDINATION

Comments

Comment ID	Name / Organization	Comment
45.02	Minnesota State Council on Disability	We commend the plan for recognizing the need to coordinate transit planning with Non-emergency Medical Transportation services. Among the most important roles transportation systems play in the lives of people with disabilities is as a bridge to vital medical services.

Response

Thank you for your comment.

SUMMARY OF DOCUMENT EDITS

- No changes made

Building to a Maintainable Scale

SUPPORT FOR BUILDING TO A MAINTAINABLE / MORE EMPHASIS ON BUILDING TO A MAINTAINABLE SCALE

Comments

Comment ID	Name / Organization	Comment
15.02	Jason Gottfried - Hennepin County	Build to maintainable scale, This is a crucial point, should be guiding star above all else. Hope this is expanded upon within the document. If capital funding does continue to stagnate if not decline, do we have a contingency plan to maintain existing infrastructure? Does roads/rail/airports get sold off to private sector, or do we introduce tolls?
25.07, 32.07, 51.07, 52.07, 53.07, 54.07, 55.07, 56.07, 57.07, 58.07, 59.07, 60.07, 61.07, 62.07, 63.07, 64.07, 65.07, 66.07, 67.07, 68.07, 69.07, 70.07, 71.07, 72.07, 73.07, 74.07, 75.07, 76.07, 77.07, 78.07, 79.07, 80.07, 81.07, 82.07, 83.07, 84.07, 85.07, 86.07, 87.07, 88.07, 89.07, 90.07, 91.07, 92.07, 93.07, 94.07, 95.07, 96.07, 97.07, 98.07, 99.07, 100.07, 101.07, 102.07, 103.07, 104.07, 105.07, 106.07, 107.07, 108.07, 109.07, 110.07, 111.07, 113.07, 114.07, 116.07, 117.07, 118.07, 119.07, 120.07, 121.07, 122.07, 123.07, 124.07, 125.07, 126.07, 127.07, 128.07, 129.07	See Summary of Commenters table	4) There are many positives in the plan. These include...a guiding principle to build to a maintainable scale: consider and minimize long-term obligations--don't overbuild (pg. 11)

Comment ID	Name / Organization	Comment
34.06	Federal Transit Administration	Previous planners and decision-makers seemingly did not account for the tremendous financial burden that has resulted decades later to maintain the vast transportation system in a state of good repair. It is unclear from these plans that proposals for maintaining and expanding the transportation system are sustainable in the long run due to significant funding shortfalls. The documents do not resolve or explore all options that could be considered to address the funding, congestion, safety and GHG problems that will remain and/or increase with implementation of these plans. These issues are in part a result of market failure, whereby the effective price facing individual travelers does not fully reflect marginal costs associated with use of the transportation system.
39.01	Federal Highway Administration	A guiding principle of the SMTP is building to a maintainable scale with the acknowledgement that portions of the system may require strategic reduction or expansion to meet shifting transportation demands. This point is given further context when the SMTP notes Minnesota has the fifth largest system of streets, roads and highways in the country while ranking 21 st in population and 12 th in geographic size. Given the funding shortfall necessary to keep the current system at a serviceable level, does MnDOT have a clear, quantifiable definition of what constitutes a maintainable scale? The document could be improved by exploring and defining the concept, then offering potential solutions to reach the identified level. For example, could certain higher-capacity roadways with low AADT undergo a capacity reduction that would yield long-term savings while right-sizing the systems maintainable scale?
40.01	Zack Mensinger	I am glad to see that you specifically mention avoiding overbuilt facilities. I think this is currently a huge problem. I have watched new bridges and overpasses being built where they are not needed, when facilities that serve other modes are ignored or given only minimal consideration.

Response

Building to a maintainable scale is a core guiding principle identified in the Minnesota GO Vision. It is also reflected in multiple ways through the policy direction of the Statewide Multimodal Transportation Plan, specifically through the emphasis on asset management and system management in the System Stewardship objective (pg. 90). Identifying and prioritizing certain networks for all modes and better aligning ownership and operation of transportation assets are strategies that will help achieve this goal. The transportation partners responsible for individual assets and services will need to determine what specifically this means for their system. For example, MnDOT prioritizes asset management over expansion for the state highway system. The 20-year

Minnesota State Highway Investment Plan directs the majority of funding to improving pavement and bridge condition and very little to the construction of new highway infrastructure. However, it is also important to note that building to a maintainable scale does not mean nothing new will be implemented. Another core element of the Minnesota GO Vision is that the system will change over time. As the population, economy, transportation behavior and technology continue to evolve, new connections may be justified. The Critical Connections objective (pg. 84) emphasizes the importance of being strategic when implementing new connections.

SUMMARY OF DOCUMENT EDITS

- No changes made

Climate Change & Environmental Quality

GENERAL SUPPORT FOR CLIMATE CHANGE / ENVIRONMENTAL QUALITY FOCUS

Comments

Comment ID	Name / Organization	Comment
1.01	Brett Cease	Thank you MNDOT for including adaptation and mitigation efforts into your plan for climate change--this kind of leadership is an example for any state-level planning process.
38.05	Minnesota Pollution Control Agency	The Minnesota Pollution Control Agency (MPCA) appreciates the many opportunities the Minnesota Department of Transportation (MnDOT) gave us to provide input on the August 2016 Drafts of the Minnesota State Transportation Plans (Plans). We also commend MnDOT for improvements made during the drafting process to address issues where the MPCA has regulatory responsibility and other interests, including... Encouraging communities to participate in programs which support efforts to mitigate, plan for, and adapt to climate change issues of local significance such as water conservation, stormwater green infrastructure adaptation, greenhouse gas reduction, use of alternative energy sources, and infrastructure planning.
35.28	Hennepin County Staff	Page 47: Well-written section and the effect chart on p. 48 was clear and colors used were a good wake up call to move beyond politics to preparation/mitigation.
38.01	Minnesota Pollution Control Agency	The Minnesota Pollution Control Agency (MPCA) appreciates the many opportunities the Minnesota Department of Transportation (MnDOT) gave us to provide input on the August 2016 Drafts of the Minnesota State Transportation Plans (Plans). We also commend MnDOT for improvements made during the drafting process to address issues where the MPCA has regulatory responsibility and other interests, including: Supporting and implementing approaches that preserve Minnesota's natural resources, avoid causing environmental harm, and improve environmental quality

Response

Thank you for your comments.

SUMMARY OF DOCUMENT EDITS

- No changes made

MORE EMPHASIS ON HEAT ISLAND IMPACTS IS NEEDED

Comments

Comment ID	Name / Organization	Comment
9.02	D	<p>The plan should explicitly address heat island effects and set forth that when making infrastructure/building decisions, decreasing heat island effects should always be a factor in future MNDOT decisions. Among other things; choosing lighter colored road surfaces, and green or reflective roofs on new buildings, and increasing the amount of green space (when possible); may help protect Minnesotans from some of the harms caused by climate change. This may be particularly important in urban areas. Here is some background info on the topic:</p> <p>http://www.climatecentral.org/news/urban-heat-islands-threaten-us-health-17919https://www.sciencedaily.com/releases/2015/09/150928182124.html</p> <p>https://www.sciencedaily.com/releases/2015/01/150130102543.html</p> <p>http://www.citypages.com/news/minneapolis-st-paul-will-be-among-worst-hit-by-climate-change-7472836</p> <p>http://www.eurekalert.org/pub_releases/2015-11/uom-nuh111815.php</p> <p>https://www.austintexas.gov/coolspaceshttp://turf.umn.edu/2014/03/chill-turfgrass-cover-reduces-urban-heat-island-effect-2/</p> <p>http://iopscience.iop.org/article/10.1088/1748-9326/9/5/055002/meta:jsessionid=C1E283340E7E864FECDF24421849441.c5.iopscience.cld.iop.org</p> <p>https://www.sciencedaily.com/releases/2015/12/151222163423.htmhttp://phys.org/news/2015-05-bright-facades-trees-smog.html</p> <p>https://www.sciencedaily.com/releases/2016/06/160601163530.html</p> <p>https://www.epa.gov/heat-islands</p> <p>http://www.apartmenttherapy.com/the-benefits-of-permeable-pavi-118431</p> <p>http://www.mprnews.org/story/2016/07/14/designing-for-heat-wave</p>

Response

The urban heat island effect is discussed in the Health and Transportation trend analysis and in the Minnesota Department of Health’s Health Impact Assessment on the SMTP. Efforts to decrease urban heat islands are consistent with the Healthy Communities strategy to “implement approaches that preserve Minnesota’s natural resources, avoid causing environmental harm and improve environmental quality.” MnDOT will consider adding guidance related to urban heat islands in urban areas in the implementation of the work plan item to “update MnDOT technical guidance to incorporate new practices and policy direction.”

SUMMARY OF DOCUMENT EDITS

- No changes made

MORE EMPHASIS ON AIR QUALITY IMPACTS IS NEEDED

Comments

Comment ID	Name / Organization	Comment
9.03	D	<p>Living in close proximity to major highways poses serious health risks, risks which disproportionately tend to impact poor and minority communities. Traffic-related air pollution may even cause epigenetic changes that could potentially cause health harm that lasts for generations. Allowing new housing and schools to be built in close proximity to major highways could potentially cause generations worth of health injustices. Explicit goals with performance measures should be set in the plan for increasing the amount of green space and other air pollution mitigating infrastructure buffering major highways. The plan should also discourage the building of new housing and schools within the immediate vicinity of major highways. Plans should also be made to provide those currently living within the immediate vicinity of major highways (or considering such housing) with information about the health risks to which they could be subjected (perhaps in a similar way to how warnings are provided to potential renters and buyers of homes that may contain lead-based paint). Pregnant women and families with small children in particular, should be provided with health warnings before they buy or rent property in the immediate vicinity of major highways. Here is some background info on the topic:</p> <p>http://www.medicalnewstoday.com/releases/306278.php</p> <p>http://www.eurekalert.org/pub_releases/2016-04/ats-ell041116.php</p> <p>http://ehp.niehs.nih.gov/1409449/</p> <p>http://ehp.niehs.nih.gov/1408803/</p> <p>https://www.bcm.edu/news/reproductive-health/preterm-birth-traffic-exposure-houston</p> <p>http://ehp.niehs.nih.gov/1408322/</p>

Comment ID	Name / Organization	Comment
		http://www.reuters.com/article/us-health-fertility-airpollution-idUSKCNOUT2MF http://grist.org/business-technology/air-pollution-actually-messes-with-your-genes/ http://ehjournal.biomedcentral.com/articles/10.1186/1476-069X-13-94 http://ehp.niehs.nih.gov/ehp392/ http://ehp.niehs.nih.gov/15-09824/ http://ehp.niehs.nih.gov/1409313/ http://ehp.niehs.nih.gov/1408882/ http://www.medicalnewstoday.com/releases/292223.php
43.01	Karen Soderberg - Minneapolis resident	<p>Thank you for incorporating healthy communities into your plan. Transportation is an important social determinant of health, and the impacts of transportation are multifaceted. I would also request that this plan address equity, particularly relating to local-level pollution. Minneapolis residents bear a substantial burden of vehicle emissions, particularly along freeway routes, with a disproportionate amount of those emissions contributed by non-residents. The same is true in St. Paul. Perhaps policy levers could be used to support use of low-emission vehicles (e.g. dedicated ramp lanes, HOV lane access, collaboration with Metro Transit for more park-and-ride options). I would also like to see low-emission levers for commercial vehicles. And penalties for vehicles that are burning oil down the highway.</p>

Response

Air pollution related to transportation and major highways is discussed in the Health and Transportation trend analysis and in the Minnesota Department of Health’s Health Impact Assessment on the SMTP. The topic of equity and air pollution from busy roads is explicitly discussed on page 98. The plan supports efforts to improve environmental quality and acknowledges minimizing air pollution in low-income communities and communities of color is an important part of advancing equity in the transportation system. MnDOT will review the proposal to notify potential residents of properties near major roads as it implements the work plan item to “study how transportation affects equity and identify transportation strategies that will meaningfully reduce disparities.”

While not a land use plan, the SMTP does support community-based planning that considers both land use and transportation. Within the scope of transportation decision-making, the plan gives higher priority to transportation projects in communities actively planning for and implementing mutually-supportive transportation and land use decisions. The plan specifically cites the issue of school location decisions.

The plan supports efforts to increase high occupancy vehicle use and transit. Penalties for vehicles burning oil are outside the scope of this plan and the responsibility of Minnesota State Legislature.

SUMMARY OF DOCUMENT EDITS

- No changes made

MORE EMPHASIS ON NATURAL RESOURCE IMPACTS IS NEEDED

Comments

Comment ID	Name / Organization	Comment
18.01	Joe Scott	The first bullet point of the Minnesota GO vision (Connects Minnesota’s primary assets the people, natural resources and businesses within the state to each other) needs a major caveat. It’s important to understand that sometimes connecting people natural resources has a negative impact on the long term value of the asset. You build a road to a lake, people are going to drive up there and build cabins around it. Before you know it, it’s full of fecal runoff and invasive species. Not to mention the negative impacts on biodiversity of bisecting large swaths of the ecosystem with roadways. Connecting people to natural resources is great for short term exploitation and bad for long term economic sustainability, it’s certainly not an unequivocal end in itself.

Response

Access to natural resources must be balanced with the need to protect those very resources. That is why the Minnesota GO Vision focuses on the health of the environment and the end goal of designing the transportation system in a way that is compatible with natural systems.

SUMMARY OF DOCUMENT EDITS

- No changes made

SUPPORT FOR GREENHOUSE GAS EMISSION REDUCTION TARGET / NEED MORE SPECIFICS ABOUT REACHING GREENHOUSE GAS EMISSION REDUCATION TARGET

Comments

Comment ID	Name / Organization	Comment
38.03	Minnesota Pollution Control Agency	The Minnesota Pollution Control Agency (MPCA) appreciates the many opportunities the Minnesota Department of Transportation (MnDOT) gave us to provide input on the August 2016 Drafts of the Minnesota State Transportation Plans (Plans). We also commend MnDOT for improvements made during the drafting process to address issues where the MPCA has regulatory responsibility and other interests, including:...Making transportation decisions that minimize and reduce total greenhouse gas emissions
20.01	Brendon Slotterback	Minnesota should plan its transportation system to meet state statute for the reduction of greenhouse gas pollution, which includes an 80% reduction by 2050.

Comment ID	Name / Organization	Comment
		<p>Transportation in our state accounts for over 35 million tons of greenhouse gas pollution, the second largest source by economic sector. To meet this goal, MNDOT should plan for a rapid conversion of the vehicle fleet to fully electric drivetrains. This means building charging infrastructure and implementing policies and programs that would speed up this conversion. MNDOT should also include the full externality values of pollution in any decision it makes about infrastructure, as electric utilities must do when they make investments. This means calculating the societal costs of carbon and other pollutants that will occur when a project is built, as well as the induced travel it may create. MNDOT should advocate at the legislature for a statewide mileage-based user fee to account for the congestion cost imposed by drivers, as well as expose to the market the true cost of pollution and congestion. To meet carbon goals, MNDOT must also build infrastructure to support, and actively encourage users to use other modes of transport like transit, walking, biking, and new mobility options like car sharing. This means making this infrastructure equal to, if not more important than, infrastructure (physical road space, signal priority, speed limits) for automobiles.</p>
34.04	Federal Transit Administration	<p>The SMTP states that MnDOT has adopted targets for reducing green-house gases (GHG) from the transportation sector in accordance with the Minnesota Next Generation Energy Act (MNGEA). Using a base year of 2005, the legislative-targeted CO2 reductions are 15, 30, and 80 percent by 2015, 2025, and 2050, respectively. The transportation sector is the second largest generator of GHG behind only electricity production facilities. Despite reductions in these emissions in recent years, the SMTP asserts that they are projected to be 10 to 15 percent higher than the 2015 target. The SMTP also notes the negative impacts of climate change but does not offer a substantive plan to achieve the MNGEA targets apart from mentioning the need to promote cleaner transportation options, tracking CO2 emissions, and working with stakeholders.</p>
35.26	Hennepin County Staff	<p>Page 47: Touches on carbon free transportation but does not provide specific targets or goals – how will MNDOT actually address these issues</p>
38.07	Minnesota Pollution Control Agency	<p>Actions towards greenhouse gas reduction goals, The Plans would be stronger if they included more specificity on how MnDOT's investment priorities can contribute to meeting Minnesota's statutory goals for reductions of greenhouse gas emissions. MnDOT's approach to mitigating transportation's contribution to climate change should not be limited to making transportation decisions that minimize and reduce total greenhouse gas emissions, as stated in the, Plans. Reducing greenhouse gases from transportation will require MnDOT to consider a wider range of bolder reduction strategies to be implemented within the transportation planning process. Although the state is making progress in reduction of transportation emissions, Minnesota is not currently on track to meet</p>

Comment ID	Name / Organization	Comment
		<p>the 2007 Next Generation Energy Act goals, which called for cutting the state's greenhouse gas emissions to 30 percent below 2005 base levels by 2025. As MnDOT notes in its Plans, the transportation sector is the second largest contributor to greenhouse gas emissions in Minnesota. MPCA also understands that achieving the state's reductions will present unique challenges for MnDOT. It is therefore critical that MnDOT continue to collaborate with the MPCA and other transportation partners to achieve our mutual greenhouse gas reduction goals. The MPCA appreciates MnDOT's involvement in the Climate Strategies and Economic Opportunities Workgroup and looks forward to future opportunities to collaborate on greenhouse gas reduction efforts.</p>
49.12	Transit for Livable Communities	<p>The plan indicates that reducing emissions will require shifting away from gas vehicles to promoting cleaner transportation options (pg. 47), but should provide far more specificity here. In particular, the plan should spell out the need for expanded public transit and bicycling and walking connections statewide. Without this elaboration, cleaner transportation options could be interpreted to mean cleaner cars and cleaner fuels, something MnDOT has very little control over. The recent MN Environmental Quality Board Climate Strategies Report identifies that a key strategy is to Strengthen efforts to transform land use patterns and mass transit systems to reduce reliance on single occupancy, internal combustion engine vehicle. In addition, Environmental trends were more frequently identified as the most important area of change to plan for (pg. 58).The plan includes insufficient urgency regarding reducing transportations contribution to climate change. As noted on page 47, the state is not on track to meet the 2007 Next Generation Energy Act targets. The plan needs to spell out transit, bicycling, and walking options as a priority to reduce greenhouse gas emissions and connect this to state goals, which include mode shift. As noted on page 49, Data suggests that more investment in transit, bicycling and walking infrastructure would encourage people to use these modes more often. The plan is weak on land use strategies to reduce the reliance on single occupancy vehicles. The transportation-land use interaction isn't discussed until page 62, and there is inadequate description of land use strategies and performance measures. The plan states that the adoption of context sensitive solutions and flexible design standards has been inconsistent (pg. 106).</p>

Response

This update of the SMTP is the first MnDOT plan to set a target for greenhouse gas emissions. The SMTP is a policy document. In addition to a general strategy of making decisions that reduce greenhouse gas emissions, the plan does place a priority on increasing walking, biking, transit and using a complete streets approach. Other strategies support coordinated transportation and land use planning, including transit oriented development. While efforts like Environmental Quality Board's Climate Solutions and Economic Opportunities study have added important details, more work is needed to develop a detailed implementation

plan. Through the SMTP, MnDOT is committing to actively engaging transportation partners and other partners like the Minnesota Pollution Control Agency in that effort.

MnDOT is currently developing guidance for evaluating greenhouse gas emissions in all Environmental Impact Statements and Environmental Assessments.

Since 2015, MnDOT has included the social costs of air pollution and greenhouse gas emissions in benefit-cost analysis. Details on the agency's standard values for automotive and commercial truck emissions are available at:

https://www.dot.state.mn.us/planning/program/appendix_a.html

SUMMARY OF DOCUMENT EDITS

- No changes made

DO NOT SUPPORT USING NATIVE PLANT MIXES

Comments

Comment ID	Name / Organization	Comment
35.51	Hennepin County Staff	Page 108: Native plant mixes also provides habitat for native animal life As worthy a goal as this is, I would think if anything we would want to deter wildlife from approaching roadways. In fact I would like to see efforts to mitigate interaction between the two

Response

Interaction between wildlife and vehicles travelling on roads is indeed a concern, particularly with large animals like deer. In selecting plant mixes, MnDOT works toward multiple objectives including water infiltration, increased soil stability, habitat for small animals and pollinators, and aid with blowing and drifting snow. As part of the work plan item to “study and implement new and improved practices to reduce negative environmental impacts from state highway maintenance and operations,” MnDOT will strive to balance traveler safety and properly maintained roadside areas while minimizing harm to wildlife.

SUMMARY OF DOCUMENT EDITS

- No changes made

MORE EMPHASIS ON WATER QUALITY IMPACTS IS NEEDED

Comments

Comment ID	Name / Organization	Comment
38.11	Minnesota Pollution Control Agency	Water quality, The MPCA encourages MnDOT to continue with its efforts related to water quality protection and improvements. Open communication and partnerships between MnDOT and MPCA staff have proven to be beneficial for both organizations as we work towards common water quality goals. One such, common goal is the reduction of chlorides impacting surface water and groundwater. MnDOT leads in the area of winter road salt management and MPCA staff encourages MnDOT to continue to be innovative with its efforts in this

Comment ID	Name / Organization	Comment
		area. Water quality protection and restoration requires participation from all levels of government. MnDOT should be sure that protective measures are taken when planning and implementing projects that have the potential to impact wetlands, lakes, rivers, and streams.
35.35	Hennepin County Staff	Page 63: only 1 line dedicated to the use of salt on roads? Given the extensive and expensive use of salt in the winter and the environmental degradation caused, I believe should trigger more discussion. MnDOT should reference the ample research they have done on the subject

Response

The topic of salt use is discussed in greater detail in the Environmental Quality trend paper. Trend papers are available at www.MinnesotaGO.org. MnDOT is committed to continued innovation in the use of de-icing chemicals and has invested heavily in research. In addition to the reference on page 63, the draft plan proposed developing a performance measure and target for salt used in snow and ice control, which was referenced on page 111. Since releasing the draft plan, MnDOT has finalized the new performance measure and target, which have been added to the list of Healthy Communities measures on page 96. Additional efforts to reduce chloride use during winter maintenance are also listed as part of implementing the work plan item to “study and implement new and improved practices to reduce negative environmental impacts from state highway maintenance and operations.”

SUMMARY OF DOCUMENT EDITS

- Page 96: Salt used in snow and ice control moved from the list of proposed performance measures to the list of healthy communities measures.

MORE EMPHASIS ON ELECTRIC VEHICLES IS NEEDED

Comments

Comment ID	Name / Organization	Comment
38.10	Minnesota Pollution Control Agency	Electric and plug-in hybrid vehicle infrastructure, The Plans should identify the development of electric and plug-in hybrid vehicle infrastructure as a strategy for reducing greenhouse gas and other air pollution emissions in the state. The MPCA appreciates MnDOT’s past and ongoing commitment to the development of infrastructure to support the use of electric and plug-in hybrid vehicles. These vehicles are an important part of a multi-faceted set of strategies to reduce air pollution emissions from vehicles. The MPCA looks forward to future opportunities to collaborate with MnDOT to make these vehicles a viable transportation option for Minnesotans.

Response

The potential for electric and plug-in hybrid vehicles to reduce greenhouse gas emissions is discussed in the Alternative Fuels and Vehicle Electrification trend paper. MnDOT will continue to collaborate with MPCA and other partners to promote development infrastructure supportive of electric vehicles as part of a multi-faceted set of strategies.

SUMMARY OF DOCUMENT EDITS

- No changes made

MORE EMPHASIS ON CLEAN DIESEL CONSTRUCTION EQUIPMENT IS NEEDED

Comments

Comment ID	Name / Organization	Comment
38.09	Minnesota Pollution Control Agency	Clean diesel construction equipment, The MPCA looks forward to MnDOT achieving its prior commitments to prioritizing the use of clean diesel equipment at its construction sites. MnDOT's investment directions show ambitious plans involving major construction efforts. All construction work relies on the extensive use of heavy duty diesel engines. Older diesel equipment from before 2007 emits extremely high levels of harmful air pollutants. As most, if not all, roadwork is carried out in close proximity to where Minnesotans live, commute, work, and recreate, people's exposure to heavy duty diesel emissions can be a health risk. The MPCA hopes MnDOT will move ahead soon with implementing its commitment to develop and employ model contract language including vehicle and equipment emission standards that would either require or give additional bid points for companies that agree to using newer, cleaner diesel trucks and equipment. With project plans spanning decades, the contract language should provide for ongoing updates as diesel engines continue to improve their emission standards.

Response

MnDOT remains committed to reducing the adverse effects of highway construction projects. In addition to efforts to reduce diesel emissions from MnDOT-owned equipment, the department continues to discuss alternative strategies to promoting newer, cleaner diesel equipment used by contractors. After reviewing several options, MnDOT has decided not to move forward with developing model contract language at this time. As the EPA does not currently require air quality control measures, diesel emission reduction clauses in construction contracts would be difficult to enforce. However, MnDOT will promote voluntary diesel emission reductions and the available of grant funding for equipment retrofits.

SUMMARY OF DOCUMENT EDITS

- No changes made

Environmental Justice

ANALYSIS SHOULD BE MORE SPECIFIC

Comments

Comment ID	Name / Organization	Comment
34.05	Federal Transit Administration	Page 1 of 5, The SMTP's Environmental Justice section conducts a statewide systems level overview and acknowledges that transportation systems can create barriers and disparate impacts on protected populations. The analysis could be improved by acknowledging and addressing likely disparities, currently in Minnesota's transportation system as identified in existing research (Clark, et al.), Forthcoming work plan studies that are mentioned include identification of strategies and tools for Environmental Justice assessment, with particular focus on the I-94 expressway corridor rehabilitation project. The SMTP concludes that the system-level objectives, strategies and work plan activities do not result in any disproportionate negative impacts on protected populations. It would be beneficial to expand upon the rationale behind this conclusion.
34.10	Federal Transit Administration	Environmental Justice-Consider roadway system downsizing: The SMTP and MnSHIP documents could analyze and provide explanations for the apparent discrepancies between MnDOT's Environmental Justice analysis and that of the Clark, et al. research. The plans could use the aforementioned BCA to identify and analyze potential locations for roadway system removal and capacity reduction projects to quantitatively address the disparities and health impacts to all populations.
38.06	Minnesota Pollution Control Agency	The Plans outline many policies and initiatives that support the efforts of the MPCA to protect and improve our state's air and water resources and enhance the health of all Minnesotans. In reviewing the draft Plans, the MPCA has identified some areas where we feel MnDOT should clarify and strengthen its strategies and objectives before their final adoption. Emissions reductions and environmental justice, The Plans should more clearly outline MnDOT's strategies for addressing the disproportionate burdens Minnesota's current transportation system places on low-income communities and communities of color. The Plans briefly mention equity as a concern, but they should acknowledge that the burdens placed on low-income communities and people of color are an issue of environmental justice. The Plans should state what immediate actions should be taken by MnDOT and its transportation partners to mitigate past harms and continued disparities and avoid actions in the future that would disproportionately negatively impact already over-burdened communities. Using the 1-94 study and developing an Advancing Transportation Equity Report are important first steps, but other strategies under consideration should be included. Studies show that people on the lower end of the socio-economic scale and communities of color are disproportionately

Comment ID	Name / Organization	Comment
		<p>exposed to traffic-related air pollution emissions and bear disproportionately higher health risks as a result (See study by MPCA's Dr. Gregory C. Pratt in Journal of Exposure Science and Environmental Epidemiology. Referenced at this link: http://ijwww.nature.com/jes/journal/vaop/ncurrent/abs/jes201351a.html).</p> <p>Concrete strategies must be developed to address these inequities. Steps should be taken in transportation planning and project development to avoid disproportionate negative impacts and mitigate past harms. These strategies should include emphasizing the importance of the connection between racial disparities and health outcomes, focusing, and prioritizing investments to undo previous harms and reduce disparities, planning land uses to minimize pollution exposure, informing the public about the near-road pollution problems, and identifying higher-risk areas for potential mitigation efforts.</p>

Response

A brief discussion of racial disparities was added to Appendix E. Since racial disparities currently exist, the text was clarified to note that there is a risk of disproportionate impacts on traditionally underrepresented communities. These findings are supported by related research. MnDOT and other transportation partners must ensure that the actions taken to implement the Statewide Multimodal Transportation Plan's objectives and strategies do not result in disproportionately high and adverse impacts.

SUMMARY OF DOCUMENT EDITS

- Page 219: Additional discussion related to racial disparities added to Appendix E

Equity

COMMENTS RELATED LEVEL OF SUPPORT FOR EQUITY FOCUS

Comments

GENERAL SUPPORT FOR EQUITY FOCUS / MORE EMPHASIS ON EQUITY IS NEEDED

Comment ID	Name / Organization	Comment
35.52	Hennepin County Staff	Page 40: It is good to see the explicit ties to...and to racial disparities and equity in this chapter especially with the linked documents that provide more background and data.
2.01	Sally Rouse	Racial and class equity MUST be included. I see it nowhere here. In fact the FTA has not revisited its own transit equity criteria since 1964. Current transportation projects must serve those area of concentrated poverty and/or areas of nonwhites.
41.01	Alexis Pennie - North Minneapolis Bike-Ped Advocacy Council	In the spirit of these times, MNDOT must take seriously the state's steep racial divide in Minnesota brought about in part by unequal and unjust transportation investments from years of ignoring civil rights laws, including Title VI and EJ. These MNDOT plans must be examined and corrected to bring about fair, just and

Comment ID	Name / Organization	Comment
		<p>effective transportation investments for people of color, people with low wealth and immigrants as well as seniors and students... Therefore, Recommend MNDOT undergoes a title VI review immediately. And these plans are part of that review. MNDOT has only recently started talking about civil rights and EJ although these regulations date back 54 and 22 years. This is a travesty in justice.</p>
42.02	Margaret Schuster - Minneapolis Health Department and private citizen	<p>The Engagement, Communications, and Education section falls short on listing any priorities of how this work will be done. Given that Minnesota has some of the worst race, economic, and educational disparities, MnDOT has an opportunity to provide specific outreach and engagement with communities where economic disparities are greatest, and in racial and cultural communities where past decisions (no matter the intent) had the worst impact. Racial and cultural communities consistently show the highest ridership on mass transit. Additionally, the disability community is consistently overlooked, undervalued as transit customers, and extremely vulnerable to decisions about expansion and contraction of services. Including specific racial, cultural, and disability input into all of your decision making processes and community engagement will go a long way toward creating a transportation system that is equitable for all transit system users.</p>
42.03	Margaret Schuster - Minneapolis Health Department and private citizen	<p>The performance measures and strategies portions of this open-decision making section falls short on specific outreach, engagement, and education in regards to racial, ethnic, cultural, and disability communities. Given that Minnesota has some of the worst race, economic, and educational disparities, MnDOT has an opportunity to engage communities where economic disparities are greatest, and in racial and cultural communities where past decisions (no matter the intent) had the worst impact. Racial and cultural communities consistently show the highest ridership on mass transit. Additionally, the disability community is consistently overlooked, undervalued as transit customers, and extremely vulnerable to decisions about expansion and contraction of services. Including specific racial, cultural, and disability input into all of your decision making processes and community engagement will go a long way toward creating a transportation system that is equitable for all transit system users. Additionally, adding performance measures and strategies related to language / signage at all mass transit stops including bus stops and train stations will show our diverse community that their voice and their opinions matter. When all signage is in English, all announcements are in English, and all transit alerts are in English -- it sends a clear message to people whose first language is NOT English that their ridership dollars are valued for the dollars only, not for their input, satisfaction, and decision making engagement.</p>

Comment ID	Name / Organization	Comment
49.13	Transit for Livable Communities	The plan defines equity as All people have access to a health and prosperous future(pg. 43) and notes, The transportation system must be accessible and safe for users of all abilities and incomes(pg. 11-13). Currently, however, a large share of jobs, approximately 75 percent in the Twin Cities metro, are not conveniently accessible unless the traveler has access to a car, which is often not the case for people of color and low-income residents (see Transit for Livable Communities, Transportation Performance Measures in the Twin Cities Region report).

SUPPORT FOR TRANSPORTATION EQUITY WORK PLAN ACTIVITIES

Comment ID	Name / Organization	Comment
34.11	Federal Transit Administration	MnDOT is to be commended for participating in the recent U.S. Department of Transportation Ladders of Opportunity Every Place Counts Design Challenge for I-94 between Saint Paul and Minneapolis. The effort focuses on collaboration to reduce the negative externalities that the Interstate Highway program of the 1950's and 1960's continues to impose on urban neighborhoods, particularly those consisting predominantly of minority and low income residents. Urban expressways in the higher density areas are counter to the MnDOT context sensitive design guiding principle which attests that the scale of roadways should reflect and respect the surrounding physical and social context of land uses. The U.S. DOT initiative provides a tremendous opportunity for the MnSHIP to demonstrate how unconventional changes to the I-94 corridor and other expressway thoroughfares could result in quality of life improvements while simultaneously, addressing the funding shortfall.
49.01	Transit for Livable Communities	We strongly support MnDOT developing an advancing transportation equity report (pg. 104).
25.05, 32.05, 51.05, 52.05, 53.05, 54.05, 55.05, 56.05, 57.05, 58.05, 59.05, 60.05, 61.05, 62.05, 63.05, 64.05, 65.05, 66.05, 67.05, 68.05, 69.05, 70.05, 71.05, 72.05, 73.05, 74.05, 75.05, 76.05, 77.05, 78.05, 79.05, 80.05, 81.05, 82.05, 83.05, 84.05, 85.05, 86.05, 87.05, 88.05,	See Summary of Commenters table	4) There are many positives in the plan. These include MnDOT developing an advancing transportation equity report (pg. 104)

Comment ID	Name / Organization	Comment
89.05, 90.05, 91.05, 92.05, 93.05, 94.05, 95.05, 96.05, 97.05, 98.05, 99.05, 100.05, 101.05, 102.05, 103.05, 104.05, 105.05, 106.05, 107.05, 108.05, 109.05, 110.05, 111.05, 113.05, 114.05, 116.05, 117.05, 118.05, 119.05, 120.05, 121.05, 122.05, 123.05, 124.05, 125.05, 126.05, 127.05, 128.05, 129.05		

Response

Advancing equity is an important component of the Statewide Multimodal Transportation Plan. It is integrated into every objective. The plan directs transportation partners to go beyond existing Title VI and Environmental Justice practices to ensure the transportation system meets the needs of all Minnesotans regardless of age, race, national origin, language, income, housing stability or individual ability. However, more work is needed to help transportation partners better understand what specific actions will help meaningfully reduce disparities in Minnesota. The near-term MnDOT work plan includes developing an advancing transportation equity report (pg. 104). This report is a key step to help MnDOT and other transportation partners better understand transportation equity and take more specific actions to reduce disparities. Additionally, the near-term work plan includes piloting tools and strategies to better incorporate equity into project-level decision-making using the I-94 corridor study. This pilot activities will inform future projects.

SUMMARY OF DOCUMENT EDITS

- No changes made

Health

GENERAL SUPPORT FOR HEALTH FOCUS

Comments

Comment ID	Name / Organization	Comment
23.01	Peggy Sammons	I work for Stearns County, but I am submitting this comment as a Minnesota resident. I was absolutely pleased to see that when I searched the document for the word, health, there were 107 incidents of it! Thank you for recognizing the impact transportation has on health. I also thank you for looking through the lens of health equity; It was good to see the reference to the Health Equity report to the legislature. Thank you so much for all the good work

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Comment ID	Name / Organization	Comment
		you do to keep our transportation system up and running in Minnesota. Thank you also for the chance to comment.
35.01	Hennepin County Staff	Page 6: Well done doc that clearly connects transportation with health. It's cool to see that the work at the commissioner level between cmsrs. Zelle and Ehlinger is paying off not only in terms of environmental health and active transportation, but on the social determinants of health too.
35.08	Hennepin County Staff	Page 19: I appreciate that the lead with both health and people - it sets a framework for a progressive plan
35.17	Hennepin County Staff	Page 40: It is good to see the explicit ties to health...in this chapter especially with the linked documents that provide more background and data.
47.01	Minnesota Department of Health	This plan is an excellent example of the critical role non-health sectors play in shaping the health, equity, and wellbeing of Minnesota's communities. The Minnesota GO vision and the SMTP aim to improve the conditions that make people healthy.
47.02	Minnesota Department of Health	The process for updating the SMTP was quite thorough and included input from the public and various stakeholders throughout the state. The inclusion of a Health Impact Assessment in this update was an innovative way to include health and build upon the partnership between MnDOT and MDH.
47.03	Minnesota Department of Health	The Minnesota GO Vision's goal for the multimodal transportation system is to [maximize] the health of people, the environment, and our economy. By naming health as a key motivation for transportation, Minnesota GO sets the stage for advancing health throughout our transportation systems.
47.08	Minnesota Department of Health	Work plan items of note include an increased emphasis on public engagement, equity, and developing or using new tools and innovations to achieve goals. As a whole, the work plan to guide MnDOT for the next four years is an ambitious effort that will meaningfully improve health and health equity in Minnesota.
25.06, 32.06, 51.06, 52.06, 53.06, 54.06, 55.06, 56.06, 57.06, 58.06, 59.06, 60.06, 61.06, 62.06, 63.06, 64.06, 65.06, 66.06, 67.06, 68.06,	See Summary of Commenters table	4) There are many positives in the plan. These include... the completion of a Health Impact Assessment (pg. 5)

Comment ID	Name / Organization	Comment
69.06, 70.06, 71.06, 72.06, 73.06, 74.06, 75.06, 76.06, 77.06, 78.06, 79.06, 80.06, 81.06, 82.06, 83.06, 84.06, 85.06, 86.06, 87.06, 88.06, 89.06, 90.06, 91.06, 92.06, 93.06, 94.06, 95.06, 96.06, 97.06, 98.06, 99.06, 100.06, 101.06, 102.06, 103.06, 104.06, 105.06, 106.06, 107.06, 108.06, 109.06, 110.06, 111.06, 113.06, 114.06, 116.06, 117.06, 118.06, 119.06, 120.06, 121.06, 122.06, 123.06, 124.06, 125.06, 126.06, 127.06, 128.06, 129.06		

Response

Thank you for your comments. MnDOT is committed to developing a transportation system that achieves the Minnesota GO Vision of a transportation system that maximizes the health of people, the environment and economy.

SUMMARY OF DOCUMENT EDITS

- No changes made

DO NOT SUPPORT LED LIGHTING

Comments

Comment ID	Name / Organization	Comment
9.01	D	The draft contains a target of 100% state-owned light fixtures using LED luminaries, yet it does not discuss the potential harm to human health and wildlife that blue light may cause. Please replace the goal of transitioning to 100% LED luminaries. Instead the goal should be to develop a plan for providing energy efficient lighting that minimizes blue-light caused harm to human health and wildlife. Minimizing harm to our climate is an incredibly important issue for the SMTP to address. The more that issue's importance is emphasized, the better. It is also important, however, when possible to try to minimize harm to our climate in ways that do not unnecessarily harm human health and wildlife. Here is some background information and research on the issue:

Comment ID	Name / Organization	Comment
		<p>http://www.ama-assn.org/ama/pub/news/news/2016/2016-06-14-community-guidance-street-lighting.page</p> <p>http://www.health.harvard.edu/staying-healthy/blue-light-has-a-dark-side</p> <p>http://jap.physiology.org/content/110/3/619.abstract</p> <p>https://www.sciencedaily.com/releases/2014/06/140602115916.html</p> <p>http://phys.org/news/2014-12-decoding-blue-mysterious-ability-body.html</p> <p>http://www.ncbi.nlm.nih.gov/pubmed/22989198</p> <p>http://ehp.niehs.nih.gov/122-a81/</p> <p>https://www.washingtonpost.com/national/health-science/blue-light-from-electronics-disturbs-sleep-especially-for-teenagers/2014/08/29/3edd2726-27a7-11e4-958c-268a320a60ce_story.html</p> <p>http://well.blogs.nytimes.com/2016/08/12/light-pollution-may-take-toll-on-muscles-and-bones/</p> <p>http://medicalxpress.com/news/2015-10-sleep-deprived-darkness-deprived.html</p> <p>https://www.fastcoexist.com/3043742/light-pollution-is-a-public-health-issue-its-not-just-making-you-tired-its-making-you-sick</p> <p>http://www.sonomawest.com/sonoma_west_times_and_news/news/city-dims-light-on-led-streetlight-swap-for-now/article_b6ce54a6-d5c2-11e5-920f-c7ddeb91c739.html</p> <p>http://emfsafetynetwork.org/the-perils-of-led-streetlights/</p>

Response

MnDOT acknowledges the concerns with the LED luminaries and develops lighting specifications to minimize negative impacts whenever possible. Decisions related to lighting in MnDOT-owned fixtures seek to balance a variety of factors including safety, energy efficiency, maintenance costs, public expectation and potential health concerns. More information on MnDOT lighting can be found at www.MnDOT.gov/trafficeng/lighting.

SUMMARY OF DOCUMENT EDITS

- No changes made

CONCERNS ABOUT SECOND-HAND SMOKE & TRANSIT

Comments

Comment ID	Name / Organization	Comment
33.01	Beth Kingdon	Please add an additional item to the health and safety portion of the report. I started taking mass transit exclusively to and from work in the winter of 2016 (taking both buses and LRTs). My primary concern related to my health and safety has been exposure to second-hand tobacco smoke while waiting for buses. Although bus shelters and stations have some signage that say no smoking, the signage is not prominent and tobacco use is not enforced even when city and Metro Transit police are directly in the area when smoking is happening. I've made decisions about which routes I routinely use based only on the presence of tobacco smoke at stops. The dangers of second-hand tobacco smoke are well documented and should be prominently addressed in this report.

Response

MnDOT has shared your concerns with Metro Transit.

SUMMARY OF DOCUMENT EDITS

- No changes made

Land Use

MORE EMPHASIS ON LAND USE IS NEEDED

Comments

Comment ID	Name / Organization	Comment
35.45	Hennepin County Staff	Page 95: Given the target healthy community performance measures this section should strongly emphasize smart growth, walkability, reduced reliance on automobiles, compact walkable mixed use communities and land use patterns

Response

The Healthy Communities strategies related to land use coordination, complete streets and encouraging bicycling, walking and transit incorporate the concepts of smart growth, walkability, reduced reliance on automobiles, compact walkable mixed use communities are land use patterns.

SUMMARY OF DOCUMENT EDITS

- No changes made

NEED MORE LAND USE PERFORMANCE MEASURES

Comments

Comment ID	Name / Organization	Comment
34.02	Federal Transit Administration	The plan discusses the need for the transportation system to recognize the context of place to ensure compatibility with surrounding land uses. The SMTP could be improved by adding information on existing and proposed performance measures/targets that relate to land use.
34.09	Federal Transit Administration	A joint land use and transportation performance measure: The U.S. Census Bureau provides weighted population density data by distance from city hall for 366 Metropolitan Statistical Areas (MSAs) during the years of 2000 and 2010 (http://www.census.gov/population/metro/data/poppro.html). Increases in the metric signify higher levels of population clustering and have a stronger relationship than standard population density with lower personal vehicular usage and improvements in alternate travel modes of transit, bicycling, and walking. The plans could provide details on MnDOT working in partnership with local governments to improve urban form, while quantifying expected success using the weighted population density metric in addition to anticipated changes in measures such as mode splits, VMT and GHGs.

Response

Some of the existing measures do relate to land use. For example, the annual number of jobs accessible by driving and by transit during the AM peak is both a transportation and a land use measure. MnDOT continues to research and evaluate new and potential measures. However, the Statewide Multimodal Transportation Plan is not a land use plan.

As part of the work plan item to “Develop tools and resources to support transportation decisions that reflect the surrounding context,” MnDOT will consider potential measures of land use. The department is open to specific suggestions of land use measures that would be appropriate for a transportation agency.

SUMMARY OF DOCUMENT EDITS

- No changes made

Passenger & Freight Rail

COMMENTS RELATED TO LEVEL OF SUPPORT FOR PASSENGER RAIL

Comments

MORE EMPHASIS ON PASSENGER RAIL IS NEEDED

Comment ID	Name / Organization	Comment
31.03	Joel Clemmer	The Plan should prioritize transit, passenger rail, cycling and walking...Long distance passenger rail has potential to bring vitality to small towns throughout the state.
49.10	Transit for Livable Communities	The plan should place greater emphasis on expanding intercity passenger rail. The plan calls out the environment as a top trend category and lists a Healthy Communities strategy to make transportation decisions that minimize and reduce total greenhouse gas emissions. Yet the plan fails to discuss the need for greater investment in intercity passenger rail and in fact provides three times as much text on automated vehicles as it does on intercity passenger rail.

DO NOT SUPPORT PASSENGER RAIL

Comment ID	Name / Organization	Comment
3.01	Ronald Johannsen - Farmer, Rural America needs rails.	Please do not let anymore rail systems go into disrepair, we need them for our lively hood. Transport people by bus, planes, cars and roads do not use any type of fixed rail for human transportation it is proven to not work. No above ground or tunnel type systems in Minnesota, the winters are too harsh.

Response

MnDOT remains committed to delivering a multimodal transportation system, which includes passenger rail service. The State Rail plan includes more information about priorities for passenger rail.

SUMMARY OF DOCUMENT EDITS

- No changes made

COMMENTS ON PLANNED PASSENGER RAIL PROJECTS / SUGGESTIONS FOR FUTURE PASSENGER RAIL PROJECTS

Comments

Comment ID	Name / Organization	Comment
24.01	Marsha Jones	We live in Duluth and make many trips to the Cities in a very small car or sometimes we take the bus or Skyline Shuttle. We love trains and would give

Statewide Multimodal Transportation Plan – January 2017

Comment ID	Name / Organization	Comment
		anything to have a train from Duluth to Mpls/St Paul. I'm glad it is still in your future plans.
28.01	Jack Barbier	I believe that MnDOT should waste no time in putting a second daytime TRAIN to CHICAGO into service, utilizing the existing Amtrak Empire Builder route through Red Wing and Winona. The current schedule out of St. Paul is inconvenient, especially for those of us who live on the west side of MINNEAPOLIS. In fact, a second train SHOULD depart from Minneapolis, the largest city in the state! Travel demand on this I-94 corridor is HUGE; ridership potential is HUGE; and a more attractive schedule would be an instant HIT. Minnesota is way behind other states in recognizing the need for alternatives to freeways.... alternatives like modern, fast, clean, comfortable, and relaxing trains. I urge MnDOT to work on developing an ongoing funding mechanism to allow development of these services....and to put planning for these services on the fast track. Thank you for your consideration.
131.01	Ron Karlen	Please do not spend any State funds on the rail service to Duluth. It's a boondoggle that will never achieve rider capacity that would warrant such an expenditure. The State would be better served by completing the light rail to the western suburbs. I am a Duluth resident that knows the infrastructure of the planned route Duluth will not allow enough speed to make this desirable to the passengers. I don't care if there is a lot of Federal money, it will still be a waste. Ron Karlen
6.01	Todd McGonagle	I would like to see Minnesota's major cities connected by rail in a large Y. Duluth to St. Cloud. Moorhead to St. Cloud. St. Cloud to MSP. MSP to Rochester. Along that same line, schedule is important.
8.01	Ben Pofahl	I agree with your rail priorities. Important to have trains stop in both Mpls and St. Paul. I would think the most logical route for HSR to Chicago would be through Rochester instead of making Rochester the terminus of a separate route. (It would also be great to include Madison, WI, but I presume that's outside the scope of your influence.)
36.01	Patricia McLoone	A transit issue that needs to be addressed is public transit OF PEOPLE from our area) Marshall MN) to the Twin cities area, and from our area to Sioux Falls. By this I mean something like a fast train. I would like the ease of rapid train transit to the larger urban areas without the cost and hazard of driving on roads that are overwhelmed by trucks. Big pickups, farm trucks, semi-haulers, all big vehicles. I also would like the lesser impact on the environment of a good rapid transit system over the individual use of all these cars and trucks.
50.01	Anonymous	A second DAYTIME schedule from the Twin Cities to Fargo is also needed badly. Again, the route is already used by Amtrak, but the train goes through MN in the

Comment ID	Name / Organization	Comment
		middle of the night. There is tremendous traffic potential (i.e. St. Cloud, Moorhead) on this route; again, a much-needed alternative to the grinding drive on I-94.

Response

The Statewide Multimodal Transportation Plan is a policy document that provides high-level guidance for MnDOT and other transportation partners moving forward. The plan does not include specific projects. More information about specific passenger rail projects is included in the State Rail Plan.

SUMMARY OF DOCUMENT EDITS

- No changes made

NEED A TARGET FOR RAIL DERAILMENTS PERFORMANCE MEASURE

Comments

Comment ID	Name / Organization	Comment
21.01	Nancy Miller	In Chapter 5 under Table 5-2: Total number of rail derailments No target Report totals and trend. In order to have performance measures mean anything you need to have a base line. This needs a target. Why is there no target? This is an area (Rail Safety) that is of great concern for me. We have seen the number of derailments increase. Aging infrastructure needs attention from these private railroad companies. Who is making sure this is being taken care of?

Response

Generally speaking, MnDOT only sets targets for performance measures when the agency has the ability to translate the target into an estimated level need. For example, MnDOT uses pavement condition targets to estimate the level of investment needed to reach the target condition. In areas where this is not the case, such as rail derailments, performance is evaluated in relation to the trend. However, in certain circumstances, MnDOT may set targets outside this purpose. For example, some targets are legislatively required. Others are seen as critical to communicating aspirational goals, such as the Toward Zero Deaths traffic fatality target. Just because a measure does not have a target does not mean it is not important.

SUMMARY OF DOCUMENT EDITS

- No changes made

Return on Investment

COMMENTS OF RETURN ON INVESTMENT METHODOLOGY

Comments

SUPPORT FOR EXPANDED DEFINITION OF RETURN ON INVESTMENT

Comment ID	Name / Organization	Comment
49.03	Transit for Livable Communities	Where we agree...On an expanded definition of return on investment. Calculating return on investment is not limited to only financial considerations. It also includes social, economic and environmental factors such as safety, noise, travel time, vehicle operating costs, surrounding land use and context, air quality and wetland impacts. (pg. 86)

SUPPORT FOR IMPROVING RETURN ON INVESTMENT METHODOLOGY

Comment ID	Name / Organization	Comment
34.07	Federal Transit Administration	Benefit-Cost Analysis: Upgrades to the plans could evaluate different future transportation system scenarios using estimated changes in economic welfare in terms of consumer/aggregate surplus and benefit-cost analysis (BCA) calculations. In using BCA it is recommended that known monetary values be utilized for criteria beyond the conventional elements in MnDOT's BCA guidance and include expected changes to health, ecology, noise, emissions, resource consumption, parking, barrier effects, and transportation diversity.
39.02	Federal Highway Administration	MnDOT's refinement and clarification of Return on Investment (ROI) when selecting projects is a note-worthy step in the process of continual agency improvement.

Response

Thank you for your comments.

SUMMARY OF DOCUMENT EDITS

- No changes made

Roadways

COMMENTS RELATED TO ROADWAY MAINTENANCE / PRESERVATION & EXPANSION

Comments

GENERAL SUPPORT FOR ROADWAY MAINTENANCE / PRESERVATION

Comment ID	Name / Organization	Comment
7.03	Mark	How about this for a 20 year plan....FIX ALL the roads, and ALL the bridges in the State.
49.18	Transit for Livable Communities	The plan notes that MnDOT is struggling to keep system in state of good repair (pg. 21), yet it is unclear how high a priority road and bridge maintenance is relative to expansion.

SUPPORT FOR ROADWAY EXPANSION

Comment ID	Name / Organization	Comment
3.03	Ronald Johannsen - Farmer, Rural America needs rails.	More traffic lanes
4.01	Dan Smith - Midwest Auto Brokers, Inc.	When we build our highways, don't build them for today, build them for 50-75 years ahead.

Response

The Statewide Multimodal Transportation Plan emphasizes asset management and system management through the System Stewardship objective (pg. 90). Following this direction, MnDOT prioritizes asset management over expansion for the state highway system. The 20-year Minnesota State Highway Investment Plan directs the majority of funding to improving pavement and bridge condition. This direction was set based on projected system condition, projected available revenue and priorities from public and partner input. See the 20-year Minnesota State Highway Investment Plan for more information.

SUMMARY OF DOCUMENT EDITS

- No changes made

COMMENTS ON PLANNED PROJECTS / SUGGESTIONS FOR FUTURE PROJECTS

Comments

Comment ID	Name / Organization	Comment
19.02	Lori Kampa	My other comment is on the MNPass lanes. Why are you not considering MNPass lanes on I-494/I-694 coming to the I-94 merge? Even just in the summer months

Comment ID	Name / Organization	Comment
		when traffic to the lakes is horrendous? I think a lot of people would take advantage of that option. Thank you for your consideration of our feedback.
22.01	Ken Prom	GOAL: Identify and prioritize low-cost improvements to accelerate social, economic and environmental benefits when large-scale solutions cannot be implemented in the foreseeable future. PROJECT: re-striping to add a lane on metro 62 from 100 east to France and from 35W commons east to highway 77. REDUCES 2 evening BOTTLENECKS.

Response

The Statewide Multimodal Transportation Plan is a policy document that provides high-level guidance for MnDOT and other transportation partners moving forward. The plan does not include specific projects. More detail about MnDOT’s overall highway investment direction and planned projects can be found in the 20-year Minnesota State Highway Investment Plan and the 10-year Capital Highway Investment Plan respectively. More information on potential MnPASS corridors can be found in the MnPASS System Study.

SUMMARY OF DOCUMENT EDITS

- No changes made

TOO MUCH EMPHASIS ON ROADWAY CONGESTION

Comments

Comment ID	Name / Organization	Comment
49.17	Transit for Livable Communities	There are significant problems with measuring congestion based on travel speed (pg. 21), particularly that this measure leaves out the role of land use (better to measure travel times, not speeds) and the impact of non-driving modes. MnDOT needs additional performance measures that capture level of service for all users and which place less priority on congestion for drivers. We don’t support defining congestion as freeway miles below 45 miles per hour (pg. 44) as this travel speed is not much of an inconvenience especially when compared to the lack of public transit to get to the majority of jobs in the Twin Cities metro in a reasonable period of time. Also, the plan states that since 2010, the percentage of freeway miles congested during peak travel periods in the Twin Cities remained close to 20 percent, with minor fluctuations up and down bringing into question why the plan puts so much emphasis on traffic congestion.

Response

There are many ways to measure how well the transportation system is performing, travel speed is just one. Currently, MnDOT uses the percent of freeway miles operating below 45 miles per hour during peak period to track congestion over time. It is important to look at travel speed because of the impacts on business and freight. However, system performance is much more

than travel speed. The key performance measures that tell this broader story are highlighted under the Critical Connections objective (pg. 85). They include measures of delay and reliability on the highway system and job accessibility by driving and transit, among others. It is these broader measures that more directly influence transportation decision-making.

SUMMARY OF DOCUMENT EDITS

- No changes made

Plan Implementation

SUPPORT FOR COLLABORATION IN PLAN IMPLEMENTATION

Comments

Comment ID	Name / Organization	Comment
35.48	Hennepin County Staff	Page 104: HC is working closely with MnDOT and others on the I-94 study between Downtowns. We are excited to work together to deliver a final product that enhances connectivity, person throughput, and livability for this corridor.
35.50	Hennepin County Staff	Page 107: Important to coordinate with HC on NHS intermodal Connectors conversation. Should we/do we have a rep on the MN Freight Advisory Cmte?
38.14	Minnesota Pollution Control Agency	Conclusions. As is made clear in MnDOT's draft Plans, there are many areas ripe with opportunity for collaboration between MnDOT and the MPCA as we both seek to serve the needs of all Minnesotans. Transportation and its related infrastructure are critical to the quality of life in Minnesota and the health and welfare of Minnesotans and the state's environment. We look forward to working with you as you execute your Plans in upcoming years and offer assistance in addressing the initiatives raised in our comments. Please contact Innocent Eyoh of my staff at 651-757-2347 regarding these comments.
46.01	Washington County	The recently drafted Statewide Multimodal Transportation Plan lays the groundwork for the development of a more integrated multimodal transportation system through investment in a robust transportation network that will enhance Minnesota's economic competitiveness and provide connected travel alternatives for the citizens and businesses that call Minnesota home. Washington County is impacted by many of the levels of transportation included in the plan. The county is unique in how is it affected by multimodal investments and has the following comments to be included as part of the official comment record. Roads: Many key roadways connect Washington County with the region including Interstates 494/694, Highway 36, and Highway 61. Congestion and air infrastructure are growing concerns with impacts on the county's own roadway system. Bicycling and Walking: The Mississippi River Trail and several state and regional trails pass through the county. The trails system provide exceptional travel and recreational activities to our residents and guests and our transit centers help serve users. Public Transit: Washington County is working to deliver the gold standard for bus

Comment ID	Name / Organization	Comment
		<p>rapid transit projects through the development of Gateway Gold Line bus rapid transitway. Other transit projects such as Rush Line and Red Rock Corridors are valuable in connecting individuals with jobs and educational opportunities. Freight Rail: Burlington Northern and Santa Fe (BNSF) and Canadian Pacific (CP) freight rail lines are in the Highway 61 corridor, which include offloading facilities for automobiles. The area is congested and is expected to see traffic increase in the future. Airport: An Intermediate Airport (also known as a reliever airport) is located in Lake Elmo. The airport helps relieve congestion and provides improved general aviation access to our region. Waterway System: Washington County is connected with the Mississippi and St. Croix Rivers. While there are no ports in the county the waterways are key recreational destinations for our residents and help bring thousands of visitors to our county annually. Funding: State funding is important to many of these modes of transportation. Though this is not an investment plan, dedicated funding is key to keeping the regional and state transportations systems in a condition to help us compete as a strong economy. We look forward to continuing our partnership as we work to improve and expand transportation options and connectivity in Washington County.</p>
130.01	Manitoba Infrastructure	<p>I would like to thank you for this opportunity to comment on your key statewide transportation plans. Your goals for multimodal transportation, highway investments, and transit investments demonstrate your government's commitment to social, economic, and environmental well-being for the people of Minnesota. In addition, your plan provides an excellent framework for other jurisdictions to follow. While both of our departments are mandated to improve citizen's quality of life, we also face similar challenges, such as aging infrastructure, increasing construction costs, diversifying user needs, and constraining budgets. In this context, we commend you for your strategic approach to developing a resilient and adaptive transportation framework. Manitoba is a trading province. Our way of life relies on the friendships our communities have with our neighbors and the quality of the transportation system that connects us. To improve the resilience of our transportation system, Manitoba has been working to protect our key trading corridor, Manitoba's Highway 75, from Red River flooding by increasing its flood protection to the same standard as Interstate 29 in North Dakota. In short, when the Red River floods, Manitoba will remain open for business if 1-29 is open. The highway 75 Interstate 29 corridor connects the Pembina, ND Emerson MB border crossing, which is the key trade gateway between your state and my province. Carrying CON \$18 Billion in trade goods annually, this border crossing is the busiest commercial port-of-entry west of Detroit. Together with North Dakota and Canada, we are investing in this gateway so that it continues to efficiently serve our communities and businesses into the future. I would also like to point out that our shared port-of-entry connecting Minnesota State Highway 313 to</p>

Comment ID	Name / Organization	Comment
		<p>Manitoba's Provincial Trunk Highway 12, carried more than CON \$300 million in trade between our jurisdictions in 2015 . This crossing is also a key gateway for Canadian National Railway's mainline. Finally, our shared port-of-entry at Pinecreek/Piney has been selected by Canada Border Services Agency to be part of a pilot project to examine the feasibility of remote processing. While this border crossing, is probably the least-used port-of-entry between our jurisdictions, the pilot project may, identify innovations and opportunities to make our transportation system more efficient for the future. My government looks forward to collaborating with you on our common interests, including prioritizing safety, strengthening international I multimodal trade and tourism corridors, and strengthening border crossings. Please feel free to contact Esther Nagtegaal, Assistant Deputy Minister of Transportation Policy and Motor Carrier Divisions at 204-945-5199 or Esther.Nagtegaal@gov.mb.ca, if you would like to explore these matters further. Thank you again for the opportunity to review your state plans and to share my views with you. Congratulations on a job well done!</p>
133.01	Minnesota Department of Agriculture	<p>The Minnesota Department of Agriculture (MDA) appreciates the opportunity to review the draft Statewide Multimodal Transportation Plan, 20-Year Minnesota State Highway Investment Plan, and Greater Minnesota Transit Investment Plan. The MDA supports the plans for the reason that they strive to maximize the health of people, the environment and the economy. The MDA also has an interest in the Freight Critical Connections investment area and how funds will be directed toward public and private freight facilities-rail, water and intermodal facilities. It is our understanding that Minnesota will receive approximately \$10 million a year for this program, as a result of the new federal surface transportation bill, Fixing America's Surface Transportation (FAST) Act. The MDA is already involved in statewide transportation issues through Executive Order 16-06, creating the Governor's Council on Freight Rail, that was established to elevate coordination and partnership between the state and railroads; to actively promote safety and reduce risks; and to ensure efficient movement of goods to support our economy while minimizing the impacts of those operations to our local communities. As freight plans are fully developed, we request inclusion on plans that affect agriculture. Again, thank you for the opportunity to comment and please let me know if you have any questions.</p>
39.04	Federal Highway Administration	<p>The SMTP notes ownership and operation of Minnesota's transportation assets could be better aligned with statewide, regional, and local priorities. The SMTP should be commended for offering creative and innovative ideas to achieve this across jurisdictional boundaries for example, locating city infrastructure such as water, wastewater and fiber optics under a MnDOT roadway that also supports county transit service. Does MnDOT currently have a firm strategy for encouraging</p>

Comment ID	Name / Organization	Comment
		this concept? The document could be improved by offering a clear approach to engage with regional and local partners on the topic moving forward.

Response

Implementation of the strategies (Chapter 5) and work plan activities (Chapter 6) identified in the Statewide Multimodal Transportation Plan and future planning efforts will require collaboration among all transportation partners. MnDOT looks forward to working with Hennepin County, Washington County, the Minnesota Pollution Control Agency, the Minnesota Department of Agriculture, Manitoba Infrastructure and many other partners in the upcoming years.

Additionally, MnDOT regularly seeks to partner with local jurisdictions to plan and build the transportation system. These efforts are driven by opportunities, long-standing relationships and a desire for efficient and effective use of public resources. While the agency does not currently have a firm strategy regarding creative and innovative cross-jurisdictional collaboration, MnDOT updated its policy regarding utility accommodation on highway right of way (MnDOT Policy OP002:

<https://www.dot.state.mn.us/policy/operations/op002.html>) in 2016. MnDOT will look for more opportunities for this kind of collaboration as it implements the work plan item to provide more continuous engagement with partners and the public.

SUMMARY OF DOCUMENT EDITS

- No changes made

NEED TO IDENTIFY FUNDING FOR PLAN IMPLEMENTATION

Comments

Comment ID	Name / Organization	Comment
13.02	Roger Johnson - Candidate for the MN State Senate - District 35	But I did not see any chapter on exactly what the options are for paying for all the plans. What are the costs of each aspect of the plans, if they were to be enacted in legislation? What are the options for raising the funds for each segment of those plans? I'm a all ideas must be on the table sort of person. But surely you have thoughts about how to pay for all these plans. I would like to know about those, and so do my prospective constituents. Thanks.

Response

The Statewide Multimodal Transportation Plan is not a fiscally-constrained plan. It provides high-level policy direction for transportation partners in Minnesota. The strategies identified in the plan (Chapter 5) can be implemented in many different ways. How individual partners choose to implement the policy direction will depend on their priorities and available resources. For MnDOT, the SMTP includes specific near-term work plan activities (Chapter 6). These activities were identified with the agency's resources in mind. The work plan represents high-priority activities that MnDOT expects to be able to undertake within anticipated resources.

SUMMARY OF DOCUMENT EDITS

- No changes made

Planning Process

GENERAL COMMENTS RELATED TO TREND ANALYSIS TOPICS

Comments

Comment ID	Name / Organization	Comment
2.03	Sally Rousse	Studies show that the strongest element that changes transportation behavior is money. If parking is too expensive, if gas is expensive, if parking spaces are limited and parking tickets or towing occurs, that impacts people's decisions to use transit more. Alternately if there is an incentive to not have a car (other than helping avert the effects of climate change and fossil fuel usage) -- a monetary incentive, people may also start to change their behaviors.
35.18	Hennepin County Staff	Page 42: Given these trends and projections, combined with political climate, it may be necessary to untether the Twin Cities from the rest of the state in transportation funding - very different priorities/needs
35.21	Hennepin County Staff	Page 44: Not sure how it impacts transportation in particular, but the disproportionate growth of the financial sector has many socioeconomic factors
35.22	Hennepin County Staff	Page 46: Despite growth in vehicle miles traveled, emissions from highway vehicles dropped by more than 50 percent over the last 25 years. This drop is largely due to changes in federal vehicle and fuel standards (on light-duty vehicles)
35.29	Hennepin County Staff	Page 49: This seems to capture all the key points well.
35.31	Hennepin County Staff	Page 52: Figure 3-7 shows the projected progression through autonomous vehicle phases in development.
47.04	Minnesota Department of Health	Chapter 2- Where are we now? This section does an excellent job of characterizing the current travel behaviors throughout Minnesota, including recent increases in participation in walking and bicycling. Establishing counting index locations in Greater Minnesota is a great example of how to bridge gaps in our understanding or measurement of these trends.
47.05	Minnesota Department of Health	Minnesota's immigrant and aging populations are both expected to grow over the next twenty years, potentially straining our transportation systems. The SMTP does a commendable job in describing trends in racial disparities and equity, which is the first

Comment ID	Name / Organization	Comment
		<p>step in understanding how transportation systems can help advance equity. Continuing to consider disparate impacts on communities of color throughout transportation planning will become ever more important as Minnesota continues to increase in diversity. By specifically naming climate change and describing its effects on transportation, MnDOT opens the door for further action to adapt to and mitigate future climate change hazards. Innovations in new technology, including drones and autonomous vehicles, will require greater foresight, planning, regulation, and intentional adoption to ensure the health and safety of Minnesotans and the environment. Because of the many unanswerable questions, it is important for transportation planners to be proactive in understanding the potential benefits and new challenges of these technologies.</p>
<p>25.08, 32.08, 51.08, 52.08, 53.08, 54.08, 55.08, 56.08, 57.08, 58.08, 59.08, 60.08, 61.08, 62.08, 63.08, 64.08, 65.08, 66.08, 67.08, 68.08, 69.08, 70.08, 71.08, 72.08, 73.08, 74.08, 75.08, 76.08, 77.08, 78.08, 79.08, 80.08, 81.08, 82.08, 83.08, 84.08, 85.08, 86.08, 87.08, 88.08, 89.08, 90.08, 91.08, 92.08, 93.08, 94.08, 95.08, 96.08, 97.08, 98.08, 99.08, 100.08, 101.08, 102.08, 103.08, 104.08, 105.08, 106.08, 107.08, 108.08, 109.08, 110.08, 111.08, 113.08, 114.08, 116.08, 117.08, 118.08, 119.08, 120.08, 121.08, 122.08, 123.08, 124.08, 125.08, 126.08, 127.08, 128.08, 129.08</p>	<p>See Summary of Commenters table</p>	<p>4) There are many positives in the plan. These include...newly including data on sidewalks and ridesharing services such as Uber and Lyft (pg. 16).</p>

Response

As part of the plan update process, MnDOT analyzed a number of trends related to transportation. The analysis was the focus of early public engagement activities and helped to shape the overall priorities and direction of the Statewide Multimodal

Transportation Plan. Through the SMTP work plan (Chapter 6), MnDOT plans to continue to update the trend analyses and make them available as a resource for others to use. Additional data and topics may be incorporated over time.

SUMMARY OF DOCUMENT EDITS

- No changes made

COMMENTS ON PUBLIC ENGAGEMENT PROCESS

Comments

COMPLIMENTS ON PUBLIC ENGAGEMENT PROCESS

Comment ID	Name / Organization	Comment
34.12	Federal Transit Administration	FTA appreciates the opportunity MnDOT has provided to comment on these important transportation plans. Please contact Reggie Arkell, Community Planner at 312-886-3704 or reginald.arkell@dot.gov if you have questions or concerns about this input. Thank you.
38.12	Minnesota Pollution Control Agency	Engagement. The MPCA strongly commends MnDOT for the extensive engagement it conducted as part of the development of these draft Plans.
39.05	Federal Highway Administration	The public and stakeholder outreach/engagement for the plans is to be commended.
47.06	Minnesota Department of Health	MnDOT did a commendable job in engaging the public. In particular, MnDOT made important advances in engaging traditionally hard-to-reach populations.

DID NOT DO ENOUGH FOR PUBLIC ENGAGEMENT

Comment ID	Name / Organization	Comment
7.02	Mark	Please clarify, exactly of who the other transportation partners consist? I do not know of any citizen group that is involved with this effort. All the meetings MDOT had look to be some types of Committee, or city boards, or Planning organization. All formal groups of about 5 people each. Wow that was real representative of We the people. Way to go. You get one ataboy.

Response

The transportation partners identified throughout the plan document are agencies and organizations that help deliver the state's transportation system. While they are important partners, input from the people of Minnesota is critical for identifying priorities and setting policy direction. Inclusive and meaningful public engagement was one of the primary focuses of this plan update process. Thousands of Minnesotans weighed in through hundreds of in-person events and online activities. Participation closely mirrored the state's population on a number of demographic factors. For more information about the public engagement process and how public input influenced the plan see Chapter 4 or Appendix D. Edits were made to Appendix D to clarify the full scope of engagement activities and participants. Additionally, Appendix D was updated to include activities completed since the draft plan was released.

SUMMARY OF DOCUMENT EDITS

- Page 151: Edits made to Appendix D to clarify the full scope of engagement activities and participants.
- Page 151: Appendix D updated to include activities completed since the draft plan was released.

QUESTIONS ABOUT EXISTING PERFORMANCE MEASURES

Comments

Comment ID	Name / Organization	Comment
35.42	Hennepin County Staff	Page 85: does MnDOT anticipate establishing 'Targets' for all existing performance measures?
48.25	City of Minneapolis Staff	(No page number) How were the existing performance measures originally determined? This would be helpful from a background perspective.

Response

MnDOT has used performance measures in planning and decision-making for over 20 years. During this time, measures originated through many different processes. For example, some are required by state or federal law and others are identified through planning processes. The Statewide Multimodal Transportation Plan does not include every performance measure that MnDOT uses or may consider in the future. It focuses on identifying the measures that best track progress toward each policy objective, based on available data. Additionally, not every measure has an associated target. For some measures, the most valuable piece of information is the trend. For these measures, MnDOT tracks changes over time rather than progress toward a specific target.

SUMMARY OF DOCUMENT EDITS

- No changes made

QUESTIONS ABOUT LEGAL PLANNING REQUIREMENTS

Comments

Comment ID	Name / Organization	Comment
7.01	Mark	Kindly identify the chapter and verse of the so-called State and Federal laws that require a 20 yr plan be developed? What happens at the Federal level if we do not comply? Since when does the Federal government tell Minnesota how to run their highway system? Or is it all about getting funds from the Feds? In which case, we are not really required to have a 20 year plan. Please clarify. Thank you.

Response

The federal requirements for a 20-year transportation plan are detailed in 23 USC 135 (f) and 23 CFR 450.216. The state requirements for a statewide transportation plan are detailed in Minnesota Statutes 174.03. The specific state requirements for the Statewide Multimodal Transportation Plan are listed in Minnesota Statutes 174.03 Subd. 1a. All projects that receive Federal Highway Administration or Federal Transit Administration funds – whether a state or local project – must be included in the State

Transportation Improvement Program. The State Transportation Improvement Program must be consistent with the state's long-range transportation plan and must be approved by the Federal Highway Administration and Federal Transit Administration before funds can be spent. Without a statewide long-range transportation plan, no Federal Highway Administration or Federal Transit Administration funds could be spent in the state.

SUMMARY OF DOCUMENT EDITS

- No changes made

General Plan Document & Writing

NEED AN EXECUTIVE SUMMARY

Comments

Comment ID	Name / Organization	Comment
29.03	Kevin Kirsch	I also believe the entire document is not accessible to the general public. If you truly want feedback, most people won't read a 112 page document. Please provide an executive summary that details how it is different from the previous plan and why.
49.06	Transit for Livable Communities	MnDOT should provide an executive summary to the Multimodal Plan. While, as stated on page 6, the plan provides overarching guidance and priorities for the entire transportation system, it is very hard to discern priorities given that the plan is 112 pages long plus appendices and is mostly descriptive rather than spelling out policies. This is particularly problematic when you're asking for members of the public to weigh in. At a minimum, the executive summary should spell out what is different from the previous plan and why. We are aware of the stand-alone executive summary, but that is both hard to find and serves more as a table of contents than an executive summary.
25.04, 32.04, 51.04, 52.04, 53.04, 54.04, 55.04, 56.04, 57.04, 58.04, 59.04, 60.04, 61.04, 62.04, 63.04, 64.04, 65.04, 66.04, 67.04, 68.04, 69.04, 70.04, 71.04, 72.04, 73.04, 74.04, 75.04, 76.04, 77.04, 78.04, 79.04, 80.04, 81.04, 82.04, 83.04, 84.04, 85.04, 86.04, 87.04, 88.04, 89.04, 90.04, 91.04, 92.04, 93.04, 94.04, 95.04, 96.04, 97.04, 98.04, 99.04, 100.04,	See Summary of Commenters table	3) MnDOT should provide an executive summary to the Multimodal Plan. While, as stated on page 6, the plan provides overarching guidance and priorities for the entire transportation system, it is very hard to discern priorities given that the plan is 112 pages long-plus appendices--and is mostly descriptive rather than spelling out policies. This is particularly problematic when you're asking for members of the public to weigh in. At a minimum, the executive summary should spell out what is different from the previous plan and why.

Comment ID	Name / Organization	Comment
101.04, 102.04, 103.04, 104.04, 105.04, 106.04, 107.04, 108.04, 109.04, 110.04, 111.04, 113.04, 114.04, 116.04, 117.04, 118.04, 119.04, 120.04, 121.04, 122.04, 123.04, 124.04, 125.04, 126.04, 127.04, 128.04, 129.04		

Response

An executive summary was created for the Statewide Multimodal Transportation Plan. The summary is available at www.MinnesotaGO.org.

SUMMARY OF DOCUMENT EDITS

- **Executive Summary** document created

GENERAL COMMENTS ABOUT PLAN WRITING & DESIGN

Comments

PLAN IS EASY TO UNDERSTAND

Comment ID	Name / Organization	Comment
24.02	Marsha Jones	Thank you for writing a report that even I could understand - very interesting.
39.06	Federal Highway Administration	The plans are reader-friendly and written in plain language. The technical subject matter is illustrated in a manner the public can understand and still makes the intended decisions.
39.07	Federal Highway Administration	MnDOT is to be commended for producing documents that are detailed, informative and strategic while remaining visually arresting. Use of call-out boxes, graphs, maps, pie charts, and bubble images provide a visual underpinning to the sometimes heavy topic matter discussed in both documents. This helpful visualization frames the information in a different medium, leading to a clarity text alone cannot achieve.

PLAN IS DIFFICULT TO UNDERSTAND

Comment ID	Name / Organization	Comment
13.01	Roger Johnson - Candidate for the MN State Senate - District 35	Admittedly, I have only perused the overall plan. The fancy language and terminology is evidence of trained, educated thinkers in creating plans that incorporate every conceivable aspect of transportation planning.
18.02	Joe Scott	That's about as far as I could make it in that wretched .pdf, so one more suggestion. If you're going to do a public input process, at least respect the public enough to provide them with useful information. This report reads like you fed some transportation keywords and Dilbert comics into a computer algorithm.

Response

A primary focus of the plan update process was to develop a plan that can be easily understood. Admittedly the document is not perfect. Hopefully the edits made as a result of the responses to comments will provide additional clarity.

SUMMARY OF DOCUMENT EDITS

- See [Summary of Document Edits](#) section of this document for more detail about all changes made to the draft plan

MORE CONTEXT & DISCUSSION OF TRENDS IS NEEDED IN CHAPTER 2

Comments

Comment ID	Name / Organization	Comment
35.11	Hennepin County Staff	Page 19: In 2015, # of traffic fatalities and serious injuries rises again. Can we prescribe that to increase in VMT, distracted driving, other?
48.05	City of Minneapolis Staff	(No page number) While the existing transportation system is evaluated and conclusions are drawn/statements are made no casual relationships/findings are provided that explain trends/statistics. There should be similar summaries or snapshots for each mode that summarize trends, and the how/why these trends are exhibited. Unqualified statements need to be qualified.
48.06	City of Minneapolis Staff	Page 19: The last paragraph in the Streets, Roads & Highways section, provides some statistical conclusions about injuries and crashes but neglects to offer factual or causal information such as weather, speed, etc.

Comment ID	Name / Organization	Comment
48.07	City of Minneapolis Staff	Page 21: It states that There was an increase in freeway congestion in 2015 but doesn't state why. Was it tied to construction in the system, etc.?
48.08	City of Minneapolis Staff	Page 21: This paragraph should note that the increase in bicycle commuting is directly correlated with increased investment and infrastructure improvements (improved and expanded facilities including protected bikeways, etc.)
48.11	City of Minneapolis Staff	Page 24: It is stated that Total ridership was 98.8 million in 2015. Additional context should be provided here is it the highest ever recorded? Or could mention trend that there has been continued growth since 2009 as transportation options/enhancements continue to increase/expand. A similar statement is made on Page 26 relative to Public Transit in greater MN. That context is missing here.
48.12	City of Minneapolis Staff	Page 28: Trends/context are missing here.
48.13	City of Minneapolis Staff	Page 29: Trends/context missing here. Was there increased volume, cars, shipped products, materials, goods?
48.14	City of Minneapolis Staff	Page 30: Trends/context missing here.
48.15	City of Minneapolis Staff	Page 32: trends/context missing here.

Response

Chapter 2 is meant to describe the existing transportation system in Minnesota. It includes recent data related to system size, condition, use and safety for all modes, based on data availability. More information about trends and the factors that influence the transportation system is included in Chapter 3. For each trend area, more detailed information and analysis is also available in the reports included in MnDOT's Trend Library at www.MinnesotaGO.org.

SUMMARY OF DOCUMENT EDITS

- No changes made

COMMENTS ABOUT TYPOS, STYLE & FORMATTING ERRORS

Comments

Comment ID	Name / Organization	Comment
15.01	Jason Gottfried - Hennepin County	Introduction-page 1 under step #3.) wok is misspelled
15.04	Jason Gottfried - Hennepin County	delete 'were' in 1st sentence of the 2nd paragraph
16.01	Eamon Flynn - Minnesota Department of Health	Typo: for the strategy on transportation data (pg. 77), the word data is plural; please check for subject-verb agreement (i.e. ...transportation data are kept up-to-date...). Typo on page 76: ...they focus on... Substantive comments are forthcoming.
35.06	Hennepin County Staff	Page 15: Population by county map - I like the map but it feels like it's floating on the page, utilize graphic elements to frame the map
35.13	Hennepin County Staff	Page 23: Why do we have some overlapping lines? Either more than 1 priority level, or prioritizing existing state trails - seems confusing?
35.25	Hennepin County Staff	Page 44: Hard to distinguish between government and manufacturing. Need more variation in color.
35.33	Hennepin County Staff	Page 59: Trend #5: Transportation Behavior - The description trails off below the header...
35.36	Hennepin County Staff	Page 72: Consider making the five plan objectives stand out more - bullets or otherwise highlighted
42.04	Margaret Schuster - Minneapolis Health Department and private citizen	Throughout document, define or clearly explain use of acronyms. For example, this sentence under the Cooperation & Consultation section says, To meet these new requirements, Minnesota created the area transportation partnerships, which bring local, regional, state and tribal interests together within each MnDOT district. The ATPs collaboratively... Standard procedure for use of acronyms indicate you insert the acronym after the phrase or statement. So this sentence would read: ...Minnesota created the area transportation partnerships (ATPs), which bring local... The ATPs collaboratively... Use of this standardized format with keep your readers from misunderstanding or NOT understanding what you're saying. I have encountered this in numerous areas within these plans.
48.19	City of Minneapolis Staff	Page 44: The information in the margin MnDOT defines congestion by the percent of freeway miles below 45 miles per house during peak periods. Should be located in the text, just like all other information in the margins.

Response

Any typos identified through public review and comment, as well as others found by the project team's additional review of the document, were corrected. Additionally, formatting issues were also corrected.

MnDOT's standard is to use the Associated Press writing style for all documents. The AP Style Guide does not support the use of noting abbreviations in parenthesis after the word or phrase.

Within the format of the SMTP, the call-out boxes provide additional, clarifying and often technical information that supports the text in the body of the document. The goal in structuring the document this way was to create a concise narrative that is easy to understand for the average Minnesotan. However, the call-out boxes provide more in-depth information in key places for more technical audiences.

SUMMARY OF DOCUMENT EDITS

- Entire document: Typos and formatting errors corrected

ISSUES WITH PLAN HYPERLINKS

Comments

Comment ID	Name / Organization	Comment
35.19	Hennepin County Staff	Page 43: Happy to see that there is an health lens the hotlink to Health trends in MN opens up in the current link though rather than as a separate page so you lose your place when you hit the back button and have to search and find where you were.
35.20	Hennepin County Staff	Page 44: Same comment as the health doc. It's GREAT that there's even a separate paper! It just need to open up in a separate page.

Response

Unfortunately this is an issue with the Adobe Acrobat software. When viewing a PDF in an internet browser, hyperlinks will open in the same window. However, there are others ways to view the document to avoid this issue. For example, a downloaded PDF document viewed from the reader's computer will open hyperlinks in a browser window. Additionally, a fully-web version of the plan, not just the PDF, is available at www.MinnesotaGO.org. Hyperlinks from the web version will open in a new browser window.

SUMMARY OF DOCUMENT EDITS

- No changes made

Questions about Specific Plan Content

ENGAGEMENT SUMMARY IN CHAPTER 4

Comments

Comment ID	Name / Organization	Comment
35.32	Hennepin County Staff	Page 58: Do you have demographic data for groups that ranked environmental issues as a top priority? (Demographics are listed for all other categories)
35.34	Hennepin County Staff	Page 59: I'm surprised technology is not included? Perhaps its imbedded into all categories, or at least 'behavior'? - perhaps this is a result of the disproportionate lack of 'under 20 yrs.' population responses (Figure 4-2)
48.21	City of Minneapolis Staff	Page 56: The summary of engagement activities is comprehensive. But how many actual participant responses were received in total? It is stated under Audience that 56% provided some demographic information but what is that number? It would be helpful to have that information in order to put the number into perspective.
48.22	City of Minneapolis Staff	Page 58: Were there no geographic (zip code) trends/conclusions? Could you be more explicit here to suggest the value of these statistical summaries and how they will be used? For environmental justice provisions outlined on page 68?
48.23	City of Minneapolis Staff	Page 59: The top 5 most important individual trends are outlined are there any others that are worth mentioning?
48.24	City of Minneapolis Staff	Page 60: Be more explicit here to suggest the value of these statistical summaries and how they will be used. For environmental justice provisions outlined on page 68?

Response

Total participants are identified in the call-out box on page 54. Language was also added to page 56 to include the total number of responses.

More detailed engagement data and analysis is available in Appendix D, including how participants ranked all 20+ trends and breakdowns of results by demographic groups and geographically by MnDOT district.

It is also important to note that public engagement results are not market research. The results provide general information and direction but are not necessarily statistically significant.

SUMMARY OF DOCUMENT EDITS

- Page 56: Language added to include the total number of responses during Phase 1 engagement

TRANSPORTATION FUNDING IN MINNESOTA SECTION IN CHAPTER 2

Comments

Comment ID	Name / Organization	Comment
34.01	Federal Transit Administration	The SMTP states that Minnesota has the 5th largest system of streets, roads and highways in the country even though the state ranks 21st in population and 1th in geographic size. The plan further states that MnDOT and its partners are struggling to keep the transportation system in a state of good repair due to a significant funding shortfall. The SMTP contains a financial summary that could be improved by discussing innovative strategies to address this issue.
35.15	Hennepin County Staff	Page 36: It would be nice to see a chart showing the proportion of funding from passenger fares vs. other sources for Metro Transit
48.16	City of Minneapolis Staff	Page 36: Should reference that future streetcar is included in this category.
49.11	Transit for Livable Communities	In the section on Transportation Funding, the plan should note that without increased funding (e.g. gas tax, tab fees, metro sales tax) most of the performance measures in the plan will not be met.

Response

The Transportation Funding in Minnesota section of Chapter 2 is meant to provide a high-level overview of the sources of funding for transportation in the state. It does not include specific dollar amounts, largely due to data availability and year-to-year changes. The summary also focuses on existing conditions since funding for future modes, projects and services is often undetermined. More detailed information about funding for specific projects or services can be found through individual agencies and organizations.

SUMMARY OF DOCUMENT EDITS

- No changes made

TRANSPORTATION PARTNER DEFINITIONS IN THE INTRODUCTION

Comments

Comment ID	Name / Organization	Comment
35.02	Hennepin County Staff	Page 6: It says this: Regional partners are primarily involved in the planning and programming of transportation projects. But it also should mention community and economic development and maybe private and non-profit partners who do that here in this paragraph to introduce that important connection between transport and land use and then discuss it in more detail in related chapters.
35.03	Hennepin County Staff	Page 7: Should Met C be listed here too? It seems so.

Response

The definition of regional partners was changed to clarify their role in transportation planning. Additional language was added to highlight other related activities regional partners are involved in, such as economic development and land use planning. The Metropolitan Council is considered a regional partner due to its designation as the metropolitan planning organization for the Twin Cities area.

SUMMARY OF DOCUMENT EDITS

- Page 6: Clarifying language added to the definition of regional partners

STREETS, ROADS & HIGHWAY SECTION IN CHAPTER 2

Comments

Comment ID	Name / Organization	Comment
35.12	Hennepin County Staff	Page 19: Pavement or deaths??? In 2015, Minnesota reached a new five-year high in traffic fatalities after making substantial progress in reducing deaths on the system since 2005. In total, 411 travelers lost their lives due to motor-vehicle crashes in Minnesota during 2015 (Figure 2-5).
35.16	Hennepin County Staff	Page 19: Fatalities for state are listed in the section that talks about pavement quality and mentions that 2015 saw a new high in fatalities. However, there is no mention about the causes. Why are they bringing this up here? It seems to make a link to pavement quality, when it could very well be related to an increase in distracted driving. It just seemed to stand out
35.09	Hennepin County Staff	Page 19: Do traffic fatalities and crashes include bicycles and pedestrians? If so this should be mentioned, if not consider including
15.03	Jason Gottfried - Hennepin County	Perhaps a table graphic tracking traffic fatalities per VMT would be beneficial
35.10	Hennepin County Staff	Page 19: Is there a graph that could be made available that tracks progress made on NHS, and perhaps Non-NHS bridges in poor quality?

Response

The various sections of Chapter 2 are meant to describe the existing transportation system in Minnesota. This includes recent data related to system size, condition, use and safety for each portion of the transportation system, based on data availability. For streets, roads and highways the section includes a summary of total roadway miles, vehicle miles traveled, pavement and bridge condition and safety information.

The fatalities and serious injury information provided on page 19 includes crashes involving bicyclists and pedestrians when a motor-vehicle is involved. Additional language was added to clarify which crash types are included.

The graph on page 19 shows total fatalities rather than fatalities per vehicles miles traveled because the primary focus and metric for Minnesota's traffic safety efforts, Toward Zero Deaths, is reducing total fatalities and serious injuries.

More detailed information related to recent and future trends in highway pavement and bridge condition can be found in MnDOT's Annual Transportation Performance Report and 20-year Minnesota State Highway Investment Plan.

SUMMARY OF DOCUMENT EDITS

- Page 19: Language added to clarify that safety data includes crashes involving motor-vehicles and bicyclists and pedestrians

CLARIFICATION ON TREND INFORMATION IN CHAPTER 3

Comments

Comment ID	Name / Organization	Comment
48.18	City of Minneapolis Staff	Page 43: It states that Shippers are developing new methods to more efficiently transport freight Where? How? Provide context.
48.17	City of Minneapolis Staff	Page 42: It states that A growing urban population will use transportation in different ways that people do today. Include examples here.
35.23	Hennepin County Staff	Page 46: Environmental Quality - good opportunity in this section to talk about the environmental benefits of a robust walking/ biking/ transit environment
35.27	Hennepin County Staff	Page 49: At what rate are transit, biking and walking growing?
35.30	Hennepin County Staff	Page 49: Data suggests that more investment in transit, bicycling and, walking infrastructure would encourage people to use these modes more often - where is the source for this?
48.20	City of Minneapolis Staff	Page 50: It states that More widespread drones could have positive impacts Such as? Asset management elements, bridge inspections, imaging for environmental conditions, etc.?
35.24	Hennepin County Staff	Page 46: Add a link/ footnote to MNDOT's biodiversity along roadways policy

Response

Chapter 3 provides a high-level summary of the over 20 trends that were included in the trend analysis step of the plan update process. For each specific trend, more detailed information and analysis is also available in the reports included in MnDOT's Trend Library at www.MinnesotaGO.org and linked to throughout the plan document. For example, more information about new methods to move freight can be found in the New Logistics trend paper. The Transportation Behavior paper includes more information about the differences in how urban and rural populations use transportation.

SUMMARY OF DOCUMENT EDITS

- No changes made

GUIDING PRINCIPLES IN CHAPTER 1

Comments

Comment ID	Name / Organization	Comment
35.04	Hennepin County Staff	Page 11: Ensure accessibility - Accessibility should also be related to modes of travel
35.05	Hennepin County Staff	Page 11: Will all the guiding principles receive further explanation and description?
48.04	City of Minneapolis Staff	Page 11: Ensure accessibility. Equity is missing from this principle.

Response

The Guiding Principles are quoted directly from the Minnesota GO Vision, which was approved in 2011. At this time the Vision document is not being updated. If the Vision is updated in the future there will be opportunities for public review and comment. However, many of the themes in the guiding principles, such as accessibility and equity, are discussed in more detail throughout the Statewide Multimodal Transportation Plan.

SUMMARY OF DOCUMENT EDITS

- No changes made

SNAPSHOT OF MINNESOTA’S EXISTING TRANSPORTATION SYSTEM IN CHAPTER 2

Comments

Comment ID	Name / Organization	Comment
35.07	Hennepin County Staff	Page 16: table 2.2 - Nice Ride MN is now operating in Rochester, MN as well as of August 2016

Response

Nice Ride MN does provide a bicycle rental service in Rochester, MN similar to the rental service they provide in Bemidji. According to Nice Ride MN, these services are similar to traditional bicycle rental services offered by many providers throughout Minnesota. These services are more recreational in nature. After looking into the services more, the focus of the bicycle sharing component of the at-a-glance table (pg. 16) was shifted to services with more of a transportation purpose, such as the service Nice Ride MN provides in Minneapolis and St. Paul. As such, Bemidji was removed from the table and Rochester was not added.

SUMMARY OF DOCUMENT EDITS

- Page 16: Nice Ride Bemidji was removed from the at-a-glance table

TRANSPORTATION SAFETY OBJECTIVE LANGUAGE IN CHAPTER 5

Comments

Comment ID	Name / Organization	Comment
35.38	Hennepin County Staff	Page 78: Other E's to consider: Encouragement, Evaluation and Planning

Response

Education, enforcement, engineering and emergency services, are the 4Es of safety identified by Minnesota's collaborate safety initiative Toward Zero Deaths. While other E's may not be listed specifically, it does not mean that no work is done in those areas.

SUMMARY OF DOCUMENT EDITS

- No changes made

CRITICAL CONNECTION OBJECTIVE LANGUAGE IN CHAPTER 5

Comments

Comment ID	Name / Organization	Comment
35.41	Hennepin County Staff	Page 84: Along with last mile freight connections first and last mile connections for transit users
48.01	City of Minneapolis Staff	Page 88: First paragraph - "Last-mile link" – is industry jargon – explain in this context.
48.26	City of Minneapolis Staff	Page 88: This is the first reference to single-occupancy vehicle in the document. There are also references on Page 98 and 100. It seems that this term should be introduced far earlier in the document.
35.43	Hennepin County Staff	Page 87: refers to the expansion of the transit system as a primary focus of Met Council - Does this refer to the expansion of the geographical service area, or hours/frequency/etc.?

Response

Language was added to the What This Is About section of the Critical Connections objective (pg. 84) to include language related to first- and last-mile connections for transit users. Additional edits were made to the text throughout the objective to remove the industry jargon phrases "last-mile link" and "last-mile connection". "Single-occupancy vehicles" is also a jargon term and edits were made to replace it with more plain language, such as "driving alone."

The expansion of the transit system in the Twin Cities was given as an example of one strategy the Metropolitan Council uses to reduce congestion and improve safety within the region. This could mean geographic expansion, such as new lines, or service expansions. See the Metropolitan Council's 2040 Transportation Policy Plan for more information about regional priorities for the Twin Cities.

SUMMARY OF DOCUMENT EDITS

- Page 84: Language added to the What This Is About section of the Critical Connections objective related to first- and last-mile connections for transit users
- Pages 84, 87, 88, 98, 100: Text edits to remove jargon

SYSTEM STEWARDSHIP OBJECTIVE LANGUAGE IN CHAPTER 5

Comments

Comment ID	Name / Organization	Comment
35.44	Hennepin County Staff	Page 93: In regards to right-sizing the system (Jurisdictional Transfers) does MnDOT anticipate any changes to prioritization or policies that we should be preparing for in planning our jurisdictional transfers?
48.27	City of Minneapolis Staff	Page 94: Should technology be mentioned here as having a potential role in inspections?

Response

At this time any jurisdictional transfer would be implemented following existing policies and procedure. However, it is important to note that additional funding for jurisdictional transfer projects was identified as part of the updated investment direction in the 20-year Minnesota State Highway Investment Plan.

The strategy to “conduct regular inspections of transportation infrastructure, facilities and equipment to monitor conditions and identify risks” could be implemented through either human or technology tactics. The example of MnDOT’s use of drones for bridge inspections highlights the role technology can play.

SUMMARY OF DOCUMENT EDITS

- No changes made

WORK PLAN LANGUAGE IN CHAPTER 6

Comments

Comment ID	Name / Organization	Comment
35.49	Hennepin County Staff	Page 105: Suggestion to add 'sound walls' to asset mgmt. criteria. Would be beneficial to equity conversation. It seems that sound walls have been disproportionately located in wealthier areas.
48.32	City of Minneapolis Staff	Page 105: There are several references to all highway assets. What are these technically? Is this information appropriate within the margin? This would be helpful to know from a context stand point.
48.02	City of Minneapolis Staff	Page 102: Second bullet – Are there specific areas of concentration that should be outlined here?

Comment ID	Name / Organization	Comment
48.03	City of Minneapolis Staff	Page 104: 2nd bullet – Should freeway lids/land bridges be called out in this section?
48.30	City of Minneapolis Staff	Page 102: Is this the first reference to project selection processes in this document? This concept or idea that there is room for improvement should be referenced earlier in the document. Are there other types of projects that should be noted here?
48.31	City of Minneapolis Staff	Page 103: What other safety topics? New? Ongoing?

Response

Noise walls are part of MnDOT’s current asset management planning efforts. Additionally, language was added to the “expand and improvement asset management planning” work plan activity (pg. 105) description to clarify what is included when referencing “all highway assets.”

The transportation topics and issues reference related to potential educational efforts in the “provide more continuous engagement with partners and public” work plan activity (pg. 102) are identified in more detail on page 103 in the “develop educational materials to answer key questions of interest to Minnesotans” work plan activity. However, other topics may also be identified.

The work plan activity to “pilot tools and strategies to better incorporate equity into project-level decision-making” focuses on the engagement process currently being used on the I-94 corridor, not the specific project elements under discussion such as land bridges and freeways lids.

In addition to being included in the work plan (pg. 102), the concept of increased transparency in project-selection processes and other key decisions is included the Open Decision-Making objective (p.73).

“Other safety topics” (pg. 103) refers to topics beyond those identified as immediate priorities the previous sentence - work zone safety, pedestrian and bicycle safety, motorcycle safety and distracted driving.

SUMMARY OF DOCUMENT EDITS

- Page 105: Language added to clarify “all highway assets”

BICYCLING & WALKING SECTION IN CHAPTER 2

Comments

Comment ID	Name / Organization	Comment
48.09	City of Minneapolis Staff	Page 22: In addition, the numbers provided date from 1993 to 2010. There are updated statistics that could be inserted here that further demonstrate the outlined trend.

Comment ID	Name / Organization	Comment
48.10	City of Minneapolis Staff	Page 22: How do the statements about fatalities and serious injuries mesh with those provided on Page 19? When it is stated that fatalities and serious injuries involving bicyclists and pedestrians remained unchanged - what is the number or percentage for context?

Response

Text updated in the Bicycling & Walking section to reflect more recent bicycle trip data in Minneapolis.

Fatalities and serious injuries on Minnesota roadways increased in recent years, as highlighted on page 19. However, there is still a long-term trend (2005 to 2015) of significant decrease, which is what is referenced on page 22. Bicycle and pedestrian fatality and serious injury information added.

SUMMARY OF DOCUMENT EDITS

- Page 22: Text updated with Minneapolis bicycle use data through 2015
- Page 22: Bicyclist and pedestrian crash numbers updated with 2015 data and bicycle and pedestrian added

HEALTHY COMMUNITIES OBJECTIVE LANGUAGE IN CHAPTER 5

Comments

Comment ID	Name / Organization	Comment
48.28	City of Minneapolis Staff	Page 98: Should freeway lids/land bridges be called out in this section?
48.29	City of Minneapolis Staff	Page 99: In the margin, last sentence Why was this target likely not achieved?

Response

The strategy to “support and implement approaches that preserve Minnesota’s natural resources, avoid causing environmental harm and improve environmental quality” can be implemented in a number of ways. Two examples are included to provide context. However, there are many others, such as land bridges and freeway lids, could be used.

The Next Generation Energy Act target information was included in the margin to provide context to the “make transportation decisions that minimize and reduce total greenhouse gas emissions” strategy. For more information about where Minnesota is currently related to this target and why, see the Minnesota Environmental Quality Board’s Climate Strategies Report. The report can be found at www.eqb.state.mn.us/content/climate-change.

SUMMARY OF DOCUMENT EDITS

- No changes made

OPEN DECISION-MAKING OBJECTIVE LANGUAGE IN CHAPTER 5

Comments

Comment ID	Name / Organization	Comment
35.39	Hennepin County Staff	Page 74: Change this metric from: Providing alternative transportation options for the future to Providing alternative multimodal transportation options for the future and strike use of the word alternative anywhere else that makes it look like vehicle travel is the most important mode. It seems to have been changed elsewhere in the doc but did catch the error here.

Response

The term “alternative transportation” is not ideal. However, the performance metric references specific survey language from MnDOT’s omnibus survey. Therefore, in this instance, the term is used. However, MnDOT generally discourages the use of “alternative transportation” to describe modes other than driving for the reasons noted in the comment.

SUMMARY OF DOCUMENT EDITS

- No changes made

Appendix A

COMMENT LETTERS RECEIVED

Formal letters from the following agencies and organizations were received as part of the public comment period. The individual comments within each letter are included in the **Comments & Responses** section of this report. The letters are included in their entirety in this appendix for reference.

- Federal Highway Administration
- Federal Transit Administration
- Minnesota Department of Agriculture
- Minnesota Department of Health
- Minnesota Pollution Control Agency
- Washington County
- Minnesota State Council on Disability
- Transit for Livable Communities
- Manitoba Infrastructure



U.S. DEPARTMENT OF TRANSPORTATION

Federal Highway Administration
Minnesota Division
380 Jackson Street, Suite 500
St. Paul, MN 55101-4802

October 13th, 2016

Charles A. Zelle, Commissioner
Minnesota Department of Transportation
395 John Ireland Boulevard
St. Paul, MN 55155

Subject: FHWA Comments on Minnesota State Transportation Plans

Dear Commissioner Zelle:

This letter is in response to your communication dated August 29th, 2016 requesting review and comment on the Statewide Multimodal Transportation Plan (SMTP) and 20-year Minnesota State Highway Investment Plan (MnSHIP) by the Federal Highway Administration. FHWA appreciates the opportunity to evaluate and provide feedback during the draft stages of these documents. FHWA staff has reviewed both documents, and offers the following comments organized by plan and concluded by overall observations.

Statewide Multimodal Transportation Plan (SMTP)

- A guiding principle of the SMTP is “building to a maintainable scale”, with the acknowledgement that portions of the system may require strategic reduction or expansion to meet shifting transportation demands. This point is given further context when the SMTP notes Minnesota has the “fifth largest system of streets, roads and highways in the country” while ranking 21st in population and 12th in geographic size. Given the funding shortfall necessary to keep the current system at a serviceable level, does MnDOT have a clear, quantifiable definition of what constitutes a “maintainable scale”? The document could be improved by exploring and defining the concept, then offering potential solutions to reach the identified level. For example, could certain higher-capacity roadways with low AADT undergo a capacity reduction that would yield long-term savings while right-sizing the system’s maintainable scale?
- MnDOT’s refinement and clarification of Return on Investment (ROI) when selecting projects is a noteworthy step in the process of continual agency improvement.
- The SMTP notes the advent of automated/connected vehicles have “the potential to reshape entire systems as they are known today.” The plan further cites University of Minnesota research indicating fully autonomous vehicles will be market ready by 2025 – only nine years away. Emerging research has indicated the technology has the potential to influence safety, travel time reliability, sustainability, congestion, vehicle ownership, and air quality. Considering the SMTP is a 20-year plan, and given the rapid advancement and potentially disruptive nature of this technology, the document could be improved

by adding specific policies and guidance for automated/connected vehicle consideration moving forward. A few examples of concepts to explore:

- How will freight and the corresponding infrastructure be affected when delivery vehicles are automated and operating 24 hours a day? Given the larger size and weight of trucks, will this accelerate roadway deterioration on Minnesota's heaviest freight corridors and reduce forecasted pavement life?
 - With the advent of self-driving vehicles, the elderly, disabled, or very young could gain access to transportation options they previous didn't have. Will congestion decrease given the automated nature of the vehicles, or increase with more of the non-driving population utilizing the technology and roadways? How can Minnesota plan for this?
 - Automated vehicles don't speed, and are noted as being very risk-averse. Given these safety benefits, coupled with seamless merging that will stem from vehicle-to-vehicle communication, MnDOT should consider exploring the impact this will have on interchange construction. The improvements in safety may yield a reduction in the need for large, cost-prohibitive projects such as these. This would also support MnDOT's goal of building the system to a maintainable scale.
- The SMTP notes ownership and operation of Minnesota's transportation assets could be better aligned with statewide, regional, and local priorities. The SMTP should be commended for offering creative and innovative ideas to achieve this across jurisdictional boundaries – for example, locating city infrastructure such as water, wastewater and fiber optics under a MnDOT roadway that also supports county transit service. Does MnDOT currently have a firm strategy for encouraging this concept? The document could be improved by offering a clear approach to engage with regional and local partners on the topic moving forward.

Minnesota State Highway Investment Plan (MnSHIP)

- MnSHIP goes beyond the federal requirements for the planning process, and it is a quality practice to link the long range planning performance priorities to the short-term STIP resource allocation.
- The 'other' objective including project delivery and small programs ideally would be contained within the primary objectives. Project delivery is a cost of doing business and not an objective onto itself. Without the project delivery investment, the primary objectives cannot be realized. Small programs are also a component of the primary objectives. There are some inefficiencies with dividing the funding into too many categories.
- Facilities and Roadside Infrastructure investment categories could be combined. Facilities have some different characteristics, but putting it in the same investment category can operationalize the maintenance of the facilities rather than treat them differently. Funding and tracking performance of culverts and signals are very different, but parallel to facilities. Monitoring condition performance measures for facilities would even the potential performance gap and uneven resource allocation. There are some inefficiencies with dividing the funding into too many categories.
- MnDOT has identified a funding gap to achieving the desired performance target. The desired performance target would be equivalent to an aspirational target. If MnDOT would have more resources, MnDOT would achieve the aspirational target. The projected outcome or the target (resource constrained target) in MnSHIP tells the public and decision makers what is going to be achieved based on the plan. The MnSHIP could demonstrate additional techniques on how the funding gap could be overcome. Here are some techniques that could be expanded upon:

- If tolling or public private partnerships were used, the revenue could fund a portion of the funding gap and increase performance. The discussion of potential revenue sources could be expanded to demonstrate what is needed to achieve the statewide objectives.
 - If jurisdictional transfer investments were accelerated, the unrealized maintenance, operations, and capital costs could be used to increase performance. The discussion of potential transfers could be expanded to demonstrate what is needed to achieve the statewide objectives.
 - Considering the funding gap, the plan could have additional discussion to reduce the legacy infrastructure for sustainability. Statewide or corridors could be studied for a systematic reduction in infrastructure size such as reducing lane widths, bridge widths, number of lanes, interchanges, shoulder widths, shoulder paving, bicycle infrastructure, rest areas, and railroad crossings. The safety and mobility performance impacts could be measured in order to determine the proper use of the reductions. A maximum size could be assigned to roadway types or individual segments based on use data, and implementation of the reductions could correspond with a capital investment project. The analysis would provide guidance to designers to direct the project scope. This study could support the implementation of the Complete Streets approach and Performance Based Practical Design Policy.
- Aligning the TED program with the freight funding could improve the effectiveness of both programs.
 - The performance analysis including multiple scenarios is a quality practice.

Overall Appraisal and Comments

- MnDOT is to be commended for producing documents that are detailed, informative and strategic while remaining visually arresting. Use of call-out boxes, graphs, maps, pie charts, and bubble images provide a visual underpinning to the sometimes heavy topic matter discussed in both documents. This helpful visualization frames the information in a different medium, leading to a clarity text alone cannot achieve.
- The plans are reader-friendly and written in plain language. The technical subject matter is illustrated in a manner the public can understand and still makes the intended decisions.
- The public and stakeholder outreach/engagement for the plans is to be commended.

FHWA appreciates MnDOT providing the opportunity to comment during the creation of these important foundational documents. If you have any questions regarding these comments, please contact Kris Riesenbergs at 651-291-6114 or kris.riesenberg@dot.gov. Thank you.

 Digitally signed by
KRIS D RIESENBERG
Date: 2016.10.13
10:24:51 -05'00'

Kris Riesenbergs
Technical Services Team Leader
Federal Highway Administration

Cc: Reggie Arkell, FTA
Andrew Emanuele, FHWA



U.S. Department
of Transportation
**Federal Transit
Administration**

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September 22, 2016

Charles A. Zelle, Commissioner
Minnesota Department of Transportation
395 John Ireland Boulevard, Mail Stop 440
Saint Paul, Minnesota 55155

RE: FTA Comments on Minnesota State Transportation Plans

Dear Commissioner Zelle:

The Federal Transit Administration (FTA) Region 5 Office received your correspondence dated August 29, 2016 requesting review and comment on the following draft documents recently developed by the Minnesota Department of Transportation (MnDOT): Statewide Multimodal Transportation Plan (SMTP); 20-Year Minnesota State Highway Investment Plan (MnSHIP); and the Greater Minnesota Transit Investment Plan (GMTIP). I appreciate Sara Dunlap of MnDOT reaching out to FTA and providing a presentation on the GMTIP to Reggie Arkell of our office in early August. FTA staff reviewed the three documents and provides the comments below organized first by an assessment of each plan followed by specific recommendations.

Statewide Multimodal Transportation Plan

The SMTP states that Minnesota has the 5th largest system of streets, roads and highways in the country even though the state ranks 21st in population and 12th in geographic size. The plan further states that MnDOT and its partners are struggling to keep the transportation system in a state of good repair due to a significant funding shortfall. The SMTP contains a financial summary that could be improved by discussing innovative strategies to address this issue. The plan discusses the need for the transportation system to recognize the context of place to ensure compatibility with surrounding land uses. The SMTP could be improved by adding information on existing and proposed performance measures/targets that relate to land use. There is no mention of Transportation Demand Management (TDM) strategies per se, and there could be an increased focus on describing policies/techniques for implementation to reduce travel demand.

The SMTP states that MnDOT has adopted targets for reducing green-house gases (GHG) from the transportation sector in accordance with the Minnesota Next Generation Energy Act (MNGEA). Using a base year of 2005, the legislative-targeted CO₂ reductions are 15, 30, and 80 percent by 2015, 2025, and 2050, respectively. The transportation sector is the second largest generator of GHG behind only electricity production facilities. Despite reductions in these emissions in recent years, the SMTP asserts that they are projected to be 10 to 15 percent higher than the 2015 target. The SMTP also notes the negative impacts of climate change but does not offer a substantive plan to achieve the MNGEA targets apart from mentioning the need to promote cleaner transportation options, tracking CO₂ emissions, and working with stakeholders.

The SMTP's Environmental Justice section conducts a statewide systems level overview and acknowledges that transportation systems can create barriers and disparate impacts on protected populations. The analysis could be improved by acknowledging and addressing likely disparities currently in Minnesota's transportation system as identified in existing research (Clark, et al.).¹ Forthcoming work plan studies that are mentioned include identification of strategies and tools for Environmental Justice assessment, with particular focus on the I-94 expressway corridor rehabilitation project. The SMTP concludes that the system-level objectives, strategies and work plan activities do not result in any disproportionate negative impacts on protected populations. It would be beneficial to expand upon the rationale behind this conclusion.

Minnesota State Highway Investment Plan

The MnSHIP states that needs are determined by the desire to meet investment and performance objectives related to maintaining and improving the highway system. The MnSHIP attests that expected revenue during the 20-year planning horizon is about \$21 billion while funding needs total about \$39 billion, a shortfall of about 46 percent or \$900 million per annum. The plan attributes about one-quarter of this funding shortfall to construction expenses that have been rising and are expected to increase at rates above inflation due to the costs for commodities such as steel and concrete. The remainder is due primarily to insufficient funding from user fees and general revenues. Related factors are improvements in vehicle miles per gallon (MPG) and slowing growth in vehicle miles traveled (VMT). A financial summary section is included in the MnSHIP. Discussion of innovative strategies for addressing the large funding gap would improve the document.

Through extensive collaboration, MnDOT considered three investment scenarios which varied the extent in which most funding would be dedicated to maintenance of the system. MnDOT has chosen to focus about 2/3rds of expenditures on maintaining highway pavement, bridges and roadway infrastructure in a state of good repair. The remaining funds are targeted for limited mobility improvements. As a result, the MnSHIP concludes that there will be declining performance in all areas of the state for National Highway System (NHS) and non-NHS pavement condition, travel time reliability, and safety while targets for other infrastructure-related metrics will not be met.

The MnSHIP acknowledges that some parts of the system may need to be reduced. A guiding principal of the MnSHIP is to build to a maintainable scale while considering and minimizing long-term obligations, i.e. don't overbuild. However, there are no substantive strategies or measures for success related to identifying and implementing capacity reductions which could be more beneficial in addressing other objectives and metrics. The same comment on TDM for the SMTP holds true for the MnSHIP. Thus, the plan tends to overcommit in protecting and leveraging past infrastructure investments without identifying methodologies to ensure these are the most prudent economic decisions.

¹ Clark LP, Millet DB, Marshall JD. (2014). National Patterns in Environmental Justice and Inequality: Outdoor NO₂ Air Pollution in the United States. PLoS ONE 9 (4). Available via <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0094431>.

The MnSHIP Environmental Justice section identifies the categories of protected populations by their proportions of overall inhabitants residing within one-quarter mile of the State Highway System, with breakdowns by NHS and non-NHS, and compares them to statewide percentages. The one disparity identified is that of the population living within one-quarter mile of the NHS; 17.9 percent are minorities while minorities comprise 12.8 of the state population. The MnSHIP concludes that this disparity in noise and emissions may balance out with the benefits of being closely located to the NHS. It is further asserted that there are no disproportionately high and adverse effects from the plan on protected populations. Analysis could be improved by acknowledging and addressing likely disparities currently in Minnesota's transportation system as identified in the aforementioned Clark, et al. research.

Greater Minnesota Transit Investment Plan

The GMTIP outlines goals and strategies for the next 20 years and identifies investments needed to meet 90 and 100 percent of transit demand through the year 2025 in Greater Minnesota, which excludes the Minneapolis-Saint Paul region. The plan reveals that a funding gap for transit will begin by 2021 and totals \$114 million through 2025. The expected gap is presumably wider in more distant years but specific numbers are not provided. The addition of substantive discussion on strategies to address the funding shortfall would improve the plan. The GMTIP recognizes the importance of population and employment density/clustering to support transit ridership. It would be beneficial to provide a substantive pathway in the plan to facilitate and measure appropriate urban land development patterns to support efficiency in transit patronage growth.

The GMTIP provides an inventory of service providers and their characteristics. A number of performance measures/service standards with apparent targets are identified not only for safety and asset management, but also for ridership, on-time performance, span of service, and efficiencies. MnDOT's first priority is to ensure current level of service continues system-wide with subsequent efforts focused on expansion to match expectations for increases in span of service. More in-depth discussion on the strategies to be used for improving service efficiency and sustainability using more aggressive performance measures and targets would be beneficial.

Overall Assessment and Recommendations

Previous planners and decision-makers seemingly did not account for the tremendous financial burden that has resulted decades later to maintain the vast transportation system in a state of good repair. It is unclear from these plans that proposals for maintaining and expanding the transportation system are sustainable in the long run due to significant funding shortfalls. The documents do not resolve or explore all options that could be considered to address the funding, congestion, safety and GHG problems that will remain and/or increase with implementation of these plans. These issues are in part a result of market failure, whereby the effective price facing individual travelers does not fully reflect marginal costs associated with use of the transportation system. Each of the suggestions for improvement below is applicable to all of the plans unless otherwise noted.

- Benefit-Cost Analysis: Upgrades to the plans could evaluate different future transportation system scenarios using estimated changes in economic welfare in terms of consumer/aggregate surplus and benefit-cost analysis (BCA) calculations.

In using BCA it is recommended that known monetary values be utilized for criteria beyond the conventional elements in MnDOT's BCA guidance and include expected changes to health, ecology, noise, emissions, resource consumption, parking, barrier effects, and transportation diversity.

- Travel Demand Management (TDM): The plans could outline and analyze TDM strategies, including pricing methods of both personal vehicles and transit riders (e.g. congestion pricing, VMT pricing, increased taxes and fares) to quantitatively measure expected increases in revenues and reductions in travel demand by mode using known elasticities. Descriptions of implementation pathways and challenges could be provided. Charging the full amount of costs that users impose on the system, or at least higher amounts, is more optimal in the sense that the fees are considered both a cost and a benefit and do not diminish net benefits.
- Utilize a joint land use and transportation performance measure: The U.S. Census Bureau provides weighted population density data by distance from city hall for 366 Metropolitan Statistical Areas (MSAs) during the years of 2000 and 2010 (http://www.census.gov/population/metro/data/pop_pro.html). Increases in the metric signify higher levels of population clustering and have a stronger relationship than standard population density with lower personal vehicular usage and improvements in alternate travel modes of transit, bicycling, and walking. The plans could provide details on MnDOT working in partnership with local governments to improve urban form, while quantifying expected success using the weighted population density metric in addition to anticipated changes in measures such as mode splits, VMT and GHGs.
- Environmental Justice-Consider roadway system downsizing: The SMTP and MnSHIP documents could analyze and provide explanations for the apparent discrepancies between MnDOT's Environmental Justice analysis and that of the Clark, et al. research. The plans could use the aforementioned BCA to identify and analyze potential locations for roadway system removal and capacity reduction projects to quantitatively address the disparities and health impacts to all populations.

MnDOT is to be commended for participating in the recent U.S. Department of Transportation Ladders of Opportunity Every Place Counts Design Challenge for I-94 between Saint Paul and Minneapolis. The effort focuses on collaboration to reduce the negative externalities that the Interstate Highway program of the 1950's and 1960's continues to impose on urban neighborhoods, particularly those consisting predominantly of minority and low income residents. Urban expressways in the higher density areas are counter to the MnDOT context sensitive design guiding principle which attests that the scale of roadways should reflect and respect the surrounding physical and social context of land uses. The U.S. DOT initiative provides a tremendous opportunity for the MnSHIP to demonstrate how unconventional changes to the I-94 corridor and other expressway thoroughfares could result in quality of life improvements while simultaneously addressing the funding shortfall.

RE: FTA Comments on Minnesota State Transportation Plans

FTA appreciates the opportunity MnDOT has provided to comment on these important transportation plans. Please contact Reggie Arkell, Community Planner at 312-886-3704 or reginald.arkell@dot.gov if you have questions or concerns about this input. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Marisol R. Simón". The signature is fluid and cursive, with the first name being the most prominent.

Marisol R. Simón
Regional Administrator

cc: Reggie Arkell, FTA
Jay Ciavarella, FTA
Andrew Emanuele, FHWA

October 4, 2016

Charles Zelle
Commissioner
Minnesota Department of Transportation
395 John Ireland Boulevard
St. Paul, MN 55155

RE: Draft State Transportation Plans – Review and Comment

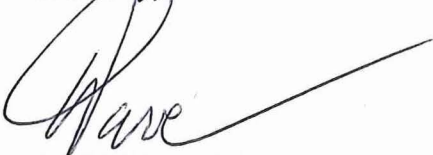
Dear Commissioner Zelle,

The Minnesota Department of Agriculture (MDA) appreciates the opportunity to review the draft Statewide Multimodal Transportation Plan, 20-Year Minnesota State Highway Investment Plan, and Greater Minnesota Transit Investment Plan. The MDA supports the plans for the reason that they strive to maximize the health of people, the environment and the economy.

The MDA also has an interest in the Freight Critical Connections investment area and how funds will be directed toward public and private freight facilities—rail, water and intermodal facilities. It is our understanding that Minnesota will receive approximately \$10 million a year for this program, as a result of the new federal surface transportation bill, Fixing America's Surface Transportation (FAST) Act. The MDA is already involved in statewide transportation issues through Executive Order 16-06, creating the Governor's Council on Freight Rail, that was established to elevate coordination and partnership between the state and railroads; to actively promote safety and reduce risks; and to ensure efficient movement of goods to support our economy while minimizing the impacts of those operations to our local communities. As freight plans are further developed, we request inclusion on plans that affect agriculture.

Again, thank you for the opportunity to comment and please let me know if you have any questions.

Sincerely,



David J. Fredrickson
Commissioner
dave.frederickson@state.mn.us

cc: Mark Gieseke, Minnesota Department of Transportation

625 Robert St. N., St. Paul, MN 55155-2538 . 651-201-6000 or 1-800-967-2474 . www.mda.state.mn.us



Minnesota
Department
of Health

PROTECTING, MAINTAINING & IMPROVING THE HEALTH OF ALL MINNESOTANS

October 13, 2016

Mr. Charles A. Zelle
Commissioner
Minnesota Department of Transportation
395 John Ireland Blvd
Saint Paul, MN 55155

Dear Commissioner Zelle,

Thank you for the opportunity to comment on the 2017 draft transportation plans:

- The **Statewide Multimodal Transportation Plan** describes many opportunities to improve health, from addressing climate change to encouraging active transportation. The SMTP makes clear the interconnection among the many modes – and users – of transportation.
- The **Greater Minnesota Transit Investment Plan** emphasizes the need for accessible public transit to connect those in Greater Minnesota to the goods and services needed to lead healthy lives.
- The **Minnesota State Highway Investment Plan** outlines MnDOT's efforts to be good stewards of public funding and the difficult choices that must be made when resources are limited. Strategic investments in health can reap many benefits for Minnesota's communities.

I commend MnDOT on language in the plans that recognizes the importance of transportation to health and equity. MnDOT made significant strides in soliciting feedback from many stakeholders, including underserved populations, through a multifaceted engagement strategy that included workplace events, forums, community events, social media, and the State Fair. Through collaboration, strategies within the plans, and collective action, MnDOT will be able to move the needle towards eliminating disparities and advancing equity throughout Minnesota.

Thank you for the opportunity to comment on the transportation plans. Specific comments pertaining to the three plans are enclosed. We look forward to working together on furthering health in transportation planning.

Sincerely,

Edward P. Ehlinger, MD, MSPH
Commissioner
P.O. Box 64975
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Enclosure: MnDOT Draft Plans Comments by MDH

REVIEW OF DRAFT MNDOT TRANSPORTATION PLANS

GREATER MINNESOTA TRANSIT INVESTMENT PLAN

The following comments specifically relate to the **Greater Minnesota Transit Investment Plan**. If you have questions about these comments, please contact Tim Held, Health Policy Division, tim.held@state.mn.us, 651-201-3868.

General comments

- Achieving health equity for all people is a comprehensive endeavor; far more sweeping than just access to healthcare or health insurance. MnDOT's vision is commendable, as it specifically targets populations that experience health inequities. The vision of this document will help provide vulnerable populations reliable transportation to education, food, income/employment, health care, and a stable ecosystem – all necessary to realize a greater measure of health equity.
- This document, though not worded specifically as such, is an excellent example of advancing health equity through a health in all policies approach across all sectors; continuing investment in efforts that currently are working to advance health equity; and strengthening community relationships and partnerships to advance health equity.
- The health benefits of physical activity have been well-documented by hundreds of studies. An increasing number of recent studies have confirmed that these benefits are specifically linked to walking and biking (Kelly, 2014; Oja et al., 2011; Saunders, Green, Petticrew, Steinbach, & Roberts, 2013). For example, it has been reported that people who bike or walk at an amount meeting the national physical activity guidelines of 150 minutes/week, the risk of death for all causes is decreased by about 10 percent (Kelly, 2014; Woodcock, Franco, Orsini, & Roberts, 2011). For risk of heart disease, one study found the risk is reduced by 16 percent for people who walk three hours per week (Hamer & Chida, 2008b) and another study found the risk is reduced by 11 percent for people who actively commute compared to people who do not actively commute (Hamer & Chida, 2008a).
- Active transportation can be a significant source of regular physical activity when incorporated into daily routines and can contribute to meeting the national physical activity guidelines of at least 150 minutes per week (Buehler, Pucher, Merom, & Bauman, 2011; Lachapelle, 2011). More people meeting the physical activity guidelines will result in reduced obesity and related chronic diseases such as diabetes, heart disease and stroke, and some cancers.
- Promoting transit use can encourage walking and biking because each trip typically starts and ends with a walk or bike ride. One study reported that transit users walk to and from the transit station for an average of 19 minutes per day, and another reported 29% of transit users walk at least 30 minutes per day (Besser & Dannenberg, 2005). Another study reported that people who use public transit walk an additional 21 minutes a day in going to and from transit stops or stations (Freeland, Banerjee, Dannenberg, & Wendel, 2013).
- "Climate change impacts will increase the total costs to the nation's transportation systems and their users, but these impacts can be reduced through rerouting, mode change, and a wide range of adaptive actions." Key Message #4 in Chapter 5. Transportation of the 3rd National Climate

Assessment, 2014. Mode change would include shifting more single-occupancy vehicle mode users to the transit mode.

- MnDOT is to be commended for its recent innovations in public engagement including in-person engagement, online engagement, and engagement of traditionally underserved communities. With Minnesota's changing demographics (particularly with the two largest generation groups of baby boomers and millennials) and urbanization trends, continuing to improve public engagement efforts for prioritizing investments is critical to building and maintaining a transportation system that meets the needs of the traveling public. Some aspects of the changes and trends point to a less car-centric system and the interest in more transit-oriented development with more public transit options.

Specific comments for Executive Summary

- The plan's objective is to improve mobility for the general public with emphasis on seniors, youth, low income populations, homeless populations, people with disabilities, veterans, new Americans and commuters. This has direct public policy and funding implications to improve current health inequities across these populations.

Specific comments for Chapter 2 – Wider Benefit of Transit

- Benefits listed under the "Health" section include increased physical activities and reduction of obesity and chronic disease. While true, these are just part of what it means to achieve health equity. However, the overall vision of this document encompasses many other components of what creates health equity.

Specific comments for Chapter 4 – Markets for Transit and Trends in Greater Minnesota

- Policy focus for this report includes analysis of "environmental justice" concerns. Part of this analysis includes "vulnerable populations", namely: minorities, the elderly, persons with limited English proficiency, households with no cars, persons with disabilities and persons with low-incomes. This policy focus represents an important step in promoting health equity, by seeking to better understand and address the transportation needs of vulnerable populations.

Specific comments for Chapter 5 – Community Input

- MnDOT supported commendable outreach efforts to gather input from hard to reach populations.

Specific comments for Chapter 7 – Strategic Direction

- One objective to improve transportation needs is for Regional Transportation Coordinating Councils to coordinate with social service agencies to develop transportation options for health and human service clients. This will help improve access to healthcare and other services for underserved populations.
- The vision is to connect people to jobs, goods, services, and recreation – all important to ensuring health equity for all people.

STATEWIDE MULTIMODAL TRANSPORTATION PLAN

The following comments specifically relate to the **Statewide Multimodal Transportation Plan**. If you have questions about these comments, please contact Eamon Flynn, Environmental Health Division, Eamon.Flynn@state.mn.us, 651-201-4506.

General comments

- This plan is an excellent example of the critical role non-health sectors play in shaping the health, equity, and wellbeing of Minnesota's communities. The Minnesota GO vision and the SMTP aim to improve the conditions that make people healthy.

Comments specific to Introduction

- The process for updating the SMTP was quite thorough and included input from the public and various stakeholders throughout the state.
- The inclusion of a Health Impact Assessment in this update was an innovative way to include health and build upon the partnership between MnDOT and MDH.

Comments specific to Chapter 1 – What are we trying to achieve?

- The Minnesota GO Vision's goal for the multimodal transportation system is to "[maximize] the health of people, the environment, and our economy." By naming health as a key motivation for transportation, Minnesota GO sets the stage for advancing health throughout our transportation systems.

Comments specific to Chapter 2 – Where are we now?

- This section does an excellent job of characterizing the current travel behaviors throughout Minnesota, including recent increases in participation in walking and bicycling. Establishing counting index locations in Greater Minnesota is a great example of how to bridge gaps in our understanding or measurement of these trends.

Comments specific to Chapter 3 – What is changing?

- Minnesota's immigrant and aging populations are both expected to grow over the next twenty years, potentially straining our transportation systems.
- The SMTP does a commendable job in describing trends in racial disparities and equity, which is the first step in understanding how transportation systems can help advance equity. Continuing to consider disparate impacts on communities of color throughout transportation planning will become ever more important as Minnesota continues to increase in diversity.
- By specifically naming climate change and describing its effects on transportation, MnDOT opens the door for further action to adapt to and mitigate future climate change hazards.
- Innovations in new technology, including drones and autonomous vehicles, will require greater foresight, planning, regulation, and intentional adoption to ensure the health and safety of

Minnesotans and the environment. Because of the many unanswerable questions, it is important for transportation planners to be proactive in understanding the potential benefits and new challenges of these technologies.

Comments specific to Chapter 4 – What is directing this plan?

- MnDOT did a commendable job in engaging the public. In particular, MnDOT made important advances in engaging traditionally hard-to-reach populations. Going forward, it is important that MnDOT nurture these relationships and continue the conversation. Whether the use of contractors to undertake public engagement initiatives helps or hinders the continued development of these relationships may warrant further internal discussions.

Comments specific to Chapter 5 – How will we guide ourselves moving forward?

- Open decision-making is critical to building a transportation system that serves all Minnesotans. The plan notes that “specific focus should be given to reaching individuals who are traditionally underrepresented in transportation decision-making,” but falls short of stating that additional resources should be afforded to these efforts (pg. 73).
- It is unclear what it means to be “confident” in building or maintaining roads and bridges. Does this refer to engineering competency or comfort with MnDOT prioritizing projects and allocating funding? Once defined, consider adding “confidence” in building and maintaining biking and walking infrastructure. (pg. 74)
- Include potential health impacts of a project to the information that should be communicated to the public. This should include both short-term (e.g., air particulates from construction, closed sidewalks or bike paths) and long-term (e.g., improved pedestrian safety or infrastructure, reduced greenhouse gas emissions) health impacts (pg. 75).
- Another project related to the strategy on early coordination (pg. 76) is the Health Impact Assessment conducted by the Headwaters Regional Development Commission in Bemidji with help from MnDOT District 2 staff. This HIA seeks to bring health considerations to a potential redesign of MN-197 in 5-10 years. Contact Naomi Carlson (ncarlson@hrdc.org) for more information. In general, HIA has been used in several Minnesota communities to coordinate health and transportation efforts, including Duluth, Winona, Bemidji, and the Twin Cities.
- Consider developing a performance metric to measure progress toward the public engagement goals described by this objective.
- One important data gap to consider is the number of trips taken by walking or bicycling. The data are important for local businesses, health professionals, traffic engineers, and transportation planners. Without a better estimate of local walking and biking levels, metrics like the number of pedestrian and bike crashes lose context and utility. The systematic use of automated bicycle counters is one potential strategy to close this data gap (pg. 77).
- Flash flood vulnerability assessments (pg. 93) is a great example of considering potential impacts of climate change. Incorporating climate change data and projections will be a key tool for asset management moving forward. A Work Plan item (pg. 105) recognizes that there are additional climate change threats that warrant evaluation. These may include drought, wildfire, extreme heat

and cold, vector-borne diseases, ecosystem threats, and air pollution. Other threats named on pg. 90 include acts of terrorism and cyber-attacks, which are not otherwise discussed.

- The maximal useful life of transportation assets (pg. 92) can also be affected by new and emerging technology such as autonomous vehicles (AVs). Advocates suggest AVs may dramatically lower the cost of transportation, undercutting demand for public transit. Furthermore, the lifespan of new transit infrastructure may begin to overlap with the large-scale introduction of AVs. While the adoption rate of AVs is difficult to predict, it illustrates the potential for new technology to rapidly change the demands on transportation systems (see “Proactively identify risks,” pg. 93). These changes also carry significant health implications. Traffic congestion and high transportation costs (such as fuel and parking) can encourage travelers to use alternative modes of transportation such as public transit. AVs may not suffer from these same barriers, allowing low-cost door-to-door transportation. This would benefit low-income families and those with disabilities, but may reduce opportunities for active transportation (e.g., walking to/from a bus stop). The realization of the many promises of AVs depend largely on how they are implemented. Will they be owned by individuals in a shared economy (e.g., Uber), by private businesses (e.g., taxi companies), or by public entities (transit agencies)? An important question to ask is how well do each of these markets serve the most vulnerable users of the transportation system? AVs may provide more services directly to a customer’s door, but how will this affect social cohesion?
- Additional suggestions for sections on Transportation Safety, Critical Connections, and Healthy Communities can be found in the *Connecting Health and Transportation: A Health Impact Assessment of the Minnesota Statewide Multimodal Transportation Plan*.

Comments specific to Chapter 6 – What is next for MnDOT?

- Work plan items of note include an increased emphasis on public engagement, equity, and developing or using new tools and innovations to achieve goals. As a whole, the work plan to guide MnDOT for the next four years is an ambitious effort that will meaningfully improve health and health equity in Minnesota.

STATE HIGHWAY INVESTMENT PLAN

The following comments specifically relate to the **State Highway Investment Plan**. If you have questions about these comments, please contact Ellen Pillsbury, Office of Statewide Health Improvement Initiatives, Ellen.Pillsbury@state.mn.us, 651-201-5493.

Specific comments for Chapter 1 – Plan Overview

- The Critical Connections category objective is key for creating health in communities by investing in a transportation system that supports travel options and access to the necessities of life, including food, employment, education, health care, and social connections.
- All people need safe and affordable transportation options.

Specific comments for Chapter 2 – Key Factors and Assumptions

- It is great that MnDOT has a state Complete Streets policy and this approach is incorporated as part of every project delivered. Because MnDOT only manages 8% of the roadways in the state (yet carries almost 60% of vehicle miles traveled and moves the majority of freight), it would be extremely beneficial if MnDOT could impress upon all transportation partners across the various jurisdictions to prioritize a Complete Streets approach so that this policy could be more fully implemented throughout the entire transportation system. With the projected funding gap of \$18 billion over the next 20 years, balancing the needs of all users (pedestrian, bicyclists, freight, transit, motor vehicles, etc.) could potentially result in some infrastructure investment savings from lower long-term maintenance costs associated with bike, pedestrian, and transit infrastructure.

Specific comments for Chapter 3 – Investment Needs

- It is good to see investment needs listed for walking and bicycling infrastructure. Accessible, well-designed, connected and comfortable walking and bicycling infrastructure provides opportunities for people to use active transportation for making local trips, which can increase physical activity.

Specific comments for Chapter 4 – Development of Investment Direction

- MnDOT is to be commended for its recent innovations in public engagement, including in-person engagement, online engagement, and engagement of traditionally underserved communities. With Minnesota's changing demographics and urbanization trends, continuing to improve public engagement efforts for prioritizing investments is critical to building and maintaining a transportation system that meets the needs of the public. Some aspects of the changes and trends point to a less car-centric system.

Specific comments for Chapter 5 – Investment Direction

- "Climate change impacts will increase the total costs to the nation's transportation systems and their users, but these impacts can be reduced through rerouting, mode change, and a wide range of adaptive actions." Key Message #4 in [Chapter 5. Transportation](#) of the 3rd National Climate Assessment, 2014. MnDOT can encourage a change from single-occupancy vehicle mode users to active transportation modes of walking, biking and transit, which may help reduce the costs of climate change impacts on transportation.

- Minnesota is experiencing an increase in historic mega-rain events due to precipitation changes from the changing climate. Of the 15 events recorded since Minnesota's statehood, eight occurred between 1858 and 2001 (~140-year period) and seven occurred between 2002 and 2016 (14-year period with two events thus far occurring in 2016). It is concerning that 13% of culverts and 24% of deep storm water tunnels are rated in poor condition. Consider reprioritizing improvements to these two roadside infrastructures to minimize flooding that could lead to further eroding of the transportation system.
- Compared to the 2012 MnSHIP 20-year investment plan, revenue for accessible pedestrian infrastructure will increase significantly (from \$300M to \$530M), which will greatly benefit the health of Minnesotans, especially those with disabilities. However, investments in bicycling infrastructure will decline by 30% (from \$200M to \$140M). The projected outcome for 2037 notes that, "Reduced investment in new improvements and maintenance of existing bicycle infrastructure leads to deterioration of the bicycle network." The reduction of \$60M is less than 0.3% of the total budget. Investments in bicycling and walking are sound investments with notable benefits for local economies, natural environments, and health.

Specific comments for Chapter 6– Priorities for Additional Revenue

- Greater Minnesota mobility is key to helping rural populations, especially communities living a distance from goods and services.

Specific comments for Chapter 7 – Moving Forward

- Continue to strive towards an equitable transportation system that will meet the needs of Minnesota's changing demographic trends of an aging population and growing racial and ethnic diversity. An equitable transportation system supports the health of communities by assuring everyone can access education, jobs and economic development.



Minnesota Pollution Control Agency

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October 12, 2016

Commissioner Charles A. Zelle
Minnesota Department of Transportation
395 John Ireland Boulevard
St. Paul, MN 55155

RE: Comments on Draft Minnesota State Transportation Plans

Dear Commissioner Zelle:

The Minnesota Pollution Control Agency (MPCA) appreciates the many opportunities the Minnesota Department of Transportation (MnDOT) gave us to provide input on the August 2016 Drafts of the Minnesota State Transportation Plans (Plans). We also commend MnDOT for improvements made during the drafting process to address issues where the MPCA has regulatory responsibility and other interests, including:

- Supporting and implementing approaches that preserve Minnesota's natural resources, avoid causing environmental harm, and improve environmental quality;
- Considering the connection between land use and transportation early in project development;
- Prioritizing transit investments in areas where infrastructure and development patterns are in place, committed to, or in development to support successful transit systems, by balancing transit ridership with added connectivity;
- Making transportation decisions that minimize and reduce total greenhouse gas emissions;
- Identifying and giving priority to infrastructure improvements, services, and education that increase the number of people who bicycle, walk, and take transit;
- Encouraging communities to participate in programs which support efforts to mitigate, plan for, and adapt to climate change issues of local significance such as water conservation, stormwater green infrastructure adaptation, greenhouse gas reduction, use of alternative energy sources, and infrastructure planning.

The Plans outline many policies and initiatives that support the efforts of the MPCA to protect and improve our state's air and water resources and enhance the health of all Minnesotans. In reviewing the draft Plans, the MPCA has identified some areas where we feel MnDOT should clarify and strengthen its strategies and objectives before their final adoption.

Emissions reductions and environmental justice

The Plans should more clearly outline MnDOT's strategies for addressing the disproportionate burdens Minnesota's current transportation system places on low-income communities and communities of color. The Plans briefly mention equity as a concern, but they should acknowledge that the burdens placed on low-income communities and people of color are an issue of environmental justice. The Plans should state what immediate actions should be taken by MnDOT and its transportation partners to mitigate past harms and continued disparities and avoid actions in the future that would disproportionately negatively impact already over-burdened communities. Using the I-94 study and developing an Advancing Transportation Equity Report are important first steps, but other strategies under consideration should be included.

Studies show that people on the lower end of the socio-economic scale and communities of color are disproportionately exposed to traffic-related air pollution emissions and bear disproportionately higher health risks as a result (See study by MPCA's Dr. Gregory C. Pratt in *Journal of Exposure Science and Environmental Epidemiology*. Referenced at this link: <http://www.nature.com/jes/journal/vaop/ncurrent/abs/jes201351a.html>). Concrete strategies must be developed to address these inequities. Steps should be taken in transportation planning and project development to avoid disproportionate negative impacts and mitigate past harms. These strategies should include emphasizing the importance of the connection between racial disparities and health outcomes, focusing and prioritizing investments to undo previous harms and reduce disparities, planning land uses to minimize pollution exposure, informing the public about the near-road pollution problems, and identifying higher-risk areas for potential mitigation efforts.

Actions towards greenhouse gas reduction goals

The Plans would be stronger if they included more specificity on how MnDOT's investment priorities can contribute to meeting Minnesota's statutory goals for reductions of greenhouse gas emissions. MnDOT's approach to mitigating transportation's contribution to climate change should not be limited to making transportation decisions that minimize and reduce total greenhouse gas emissions, as stated in the Plans. Reducing greenhouse gases from transportation will require MnDOT to consider a wider range of bolder reduction strategies to be implemented within the transportation planning process.

Although the state is making progress in reduction of transportation emissions, Minnesota is not currently on track to meet the 2007 Next Generation Energy Act goals, which called for cutting the state's greenhouse gas emissions to 30 percent below 2005 base levels by 2025. As MnDOT notes in its Plans, the transportation sector is the second largest contributor to greenhouse gas emissions in Minnesota. MPCA also understands that achieving the state's reductions will present unique challenges for MnDOT. It is therefore critical that MnDOT continue to collaborate with the MPCA and other transportation partners to achieve our mutual greenhouse gas reduction goals. The MPCA appreciates MnDOT's involvement in the Climate Strategies and Economic Opportunities Workgroup and looks forward to future opportunities to collaborate on greenhouse gas reduction efforts.

Reducing vehicle miles traveled

The Plans should clarify how MnDOT intends to achieve its stated goal of reducing vehicle miles traveled (VMT) in Minnesota. Reducing VMT is a key strategy for reducing transportation-related emissions of greenhouse gases and other air pollutants. As the state continues to grow in population and employment opportunities, efforts to reduce VMT will become even more important to combat the congestion and VMT increases that are likely to ensue without thoughtful investments in sustainable infrastructure. Achieving reductions in VMT would advance nearly all of the Plans' objectives. The MPCA fully supports this goal and its implications for land use and planning.

Clean diesel construction equipment

The MPCA looks forward to MnDOT achieving its prior commitments to prioritizing the use of clean diesel equipment at its construction sites. MnDOT's investment directions show ambitious plans involving major construction efforts. All construction work relies on the extensive use of heavy duty diesel engines. Older diesel equipment from before 2007 emits extremely high levels of harmful air pollutants. As most, if not all, roadwork is carried out in close proximity to where Minnesotans live, commute, work, and recreate, people's exposure to heavy duty diesel emissions can be a health risk.

The MPCA hopes MnDOT will move ahead soon with implementing its commitment to develop and employ model contract language including vehicle and equipment emission standards that would either require or give additional bid points for companies that agree to using newer, cleaner diesel trucks and equipment. With project plans spanning decades, the contract language should provide for ongoing updates as diesel engines continue to improve their emission standards.

Electric and plug-in hybrid vehicle infrastructure

The Plans should identify the development of electric and plug-in hybrid vehicle infrastructure as a strategy for reducing greenhouse gas and other air pollution emissions in the state. The MPCA appreciates MnDOT's past and ongoing commitment to the development of infrastructure to support the use of electric and plug-in hybrid vehicles. These vehicles are an important part of a multi-faceted set of strategies to reduce air pollution emissions from vehicles. The MPCA looks forward to future opportunities to collaborate with MnDOT to make these vehicles a viable transportation option for Minnesotans.

Water quality

The MPCA encourages MnDOT to continue with its efforts related to water quality protection and improvements. Open communication and partnerships between MnDOT and MPCA staff have proven to be beneficial for both organizations as we work towards common water quality goals. One such common goal is the reduction of chlorides impacting surface water and groundwater. MnDOT leads in the area of winter road salt management and MPCA staff encourages MnDOT to continue to be innovative with its efforts in this area. Water quality protection and restoration requires participation from all levels of government. MnDOT should be sure that protective measures are taken when planning and implementing projects that have the potential to impact wetlands, lakes, rivers, and streams.

Engagement

The MPCA strongly commends MnDOT for the extensive engagement it conducted as part of the development of these draft Plans. We hope that MnDOT will commit to continued efforts at meaningful engagement with all Minnesotans, with particular emphasis on reaching communities historically left out of decision-making processes, especially low-income communities, communities of color, and Tribes and tribal members. The MPCA is striving to improve our own efforts at reaching these populations, hearing their concerns, and including their voices in our decision-making processes. It is critical that all state agencies actively seek to provide meaningful opportunities for Minnesotans to be involved in the decisions that impact their lives.

Conclusions

As is made clear in MnDOT's draft Plans, there are many areas ripe with opportunity for collaboration between MnDOT and the MPCA as we both seek to serve the needs of all Minnesotans. Transportation and its related infrastructure are critical to the quality of life in Minnesota and the health and welfare of Minnesotans and the state's environment. We look forward to working with you as you execute your Plans in upcoming years and offer assistance in addressing the initiatives raised in our comments. Please contact Innocent Eyoh of my staff at 651-757-2347 regarding these comments.

Sincerely,



John Linc Stine
Commissioner

AS:km



Board of Commissioners

Fran Miron, District 1
Vacant, District 2
Gary Kriesel, District 3
Karla Bigham, District 4
Lisa Weik, District 5

October 12, 2016

Mark Gieseke
Director, Office of Transportation System Management
Minnesota Department of Transportation
395 John Ireland Blvd
Saint Paul, MN 55155

RE: Draft Statewide Multimodal Transportation Plan

Dear Mr. Gieseke,

The recently drafted Statewide Multimodal Transportation Plan lays the groundwork for the development of a more integrated multimodal transportation system through investment in a robust transportation network that will enhance Minnesota's economic competitiveness and provide connected travel alternatives for the citizens and businesses that call Minnesota home.

Washington County is impacted by many of the levels of transportation included in the plan. The county is unique in how is it affected by multimodal investments and has the following comments to be included as part of the official comment record.

Roads: Many key roadways connect Washington County with the region including Interstates 494/694, Highway 36, and Highway 61. Congestion and air infrastructure are growing concerns with impacts on the county's own roadway system.

Bicycling and Walking: The Mississippi River Trail and several state and regional trails pass through the county. The trails system provide exceptional travel and recreational activities to our residents and guests and our transit centers help serve users.

Public Transit: Washington County is working to deliver the gold standard for bus rapid transit projects through the development of Gateway Gold Line bus rapid transitway. Other transit projects such as Rush Line and Red Rock Corridors are valuable in connecting individuals with jobs and educational opportunities.

Freight Rail: Burlington Northern and Santa Fe (BNSF) and Canadian Pacific (CP) freight rail lines are in the Highway 61 corridor, which include offloading facilities for automobiles. The area is congested and is expected to see traffic increase in the future.

Airport: An Intermediate Airport (also known as a reliever airport) is located in Lake Elmo. The airport helps relieve congestion and provides improved general aviation access to our region.

Waterway System: Washington County is connected with the Mississippi and St. Croix Rivers. While there are no ports in the county the waterways are key recreational destinations for our residents and help bring thousands of visitors to our county annually.

Funding: State funding is important to many of these modes of transportation. Though this is not an investment plan, dedicated funding is key to keeping the regional and state transportations systems in a condition to help us compete as a strong economy.

We look forward to continuing our partnership as we work to improve and expand transportation options and connectivity in Washington County.

Sincerely,

A handwritten signature in black ink that reads "Wayne Sandberg". The letters are cursive and slightly slanted to the right.

Wayne Sandberg
Deputy Director/Assistant County Engineer



October 13, 2016

Mark Gieseke
Minnesota Department of Transportation
395 John Ireland Blvd. , Mail Stop 440
Saint Paul, MN 55155

RE: MSCOD Response to the Transportation Strategic Plan

Mr. Gieseke:

The Minnesota State Council on Disability (MSCOD) was established in 1973 to advise the governor, state agencies, state legislature, and the public on disability policy. MSCOD advocates for policies and programs that advance the rights of Minnesotans with disabilities. The quality of life of limited-mobility Minnesotans with disabilities depends on the availability of transportation options. As such, we appreciate the opportunity to give input into the Department of Transportation's strategic plans.

Having reviewed the proposed strategic plan, MSCOD feels that the Department of Transportation needs to go even further in making accessibility for Minnesotans with disabilities a core, foundational priority for all future planning. The Statewide Multimodal Transit Plan rightly identifies the demographic trend of an aging population and a correlative rise in the rate of disability in Minnesota, but fails to connect this to ensconcing accessibility as a core design principle.

We commend the plan for recognizing the need to coordinate transit planning with Non-emergency Medical Transportation services. Among the most important

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roles transportation systems play in the lives of people with disabilities is as a bridge to vital medical services. It is impossible to overstate the need for access to these services for all Minnesotans.

While the Greater Minnesota Transit Investment Plan mentions the Olmstead Plan in passing, it does not go far enough in making it a planning priority. With Minnesotans with disabilities no longer confined to institutional settings, it becomes even more imperative to ensure that every neighborhood, in every community around the state properly meets the needs of limited-mobility Minnesotans. Those goals—mandated by the United States Supreme Court—will only be realized with a robust, accessible transportation system. Therefore, any long range transportation planning must anticipate the effect of this imperative to increase mobility for Minnesotans with disabilities, living in integrated settings.

Furthermore, as the Department of Transportation plans for the coming years, MSCOD hopes it will tighten the timeline of the ADA Transition Plan. We cannot afford to wait another 10 years to fully comply with a law that has already been on the books for 26 years. People with disabilities are the largest minority group in the state and their civil rights must be respected with full access to transportation.

Lastly, accessibility in transportation starts with digital accessibility in planning documents such as these. We applaud the Department of Transportation for providing accessible versions of all plans, on their website. MSCOD is always available as a resource for MNDOT and all agencies for ensuring compliance with digital accessibility guidelines in all communications with the people of this state.

Sincerely,

Joan Willshire
Executive Director
Minnesota State Council on Disability

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October 14, 2016

Mr. Mark Gieseke
Minnesota Department of Transportation
395 John Ireland Blvd
Mail Stop 440
Saint Paul, MN 55155

Re: Comments on MnDOT's Draft Statewide Multimodal Transportation Plan

We thank the Minnesota Department of Transportation for their work on the Statewide Multimodal Transportation Plan. We care about moving Minnesota's transportation future in the right direction with this plan and believe we need a greater statewide focus on transit, bicycling, and walking over the next twenty years. Having carefully read and analyzed MnDOT's draft plan, we found some areas in need of improvement.

WHERE WE AGREE

- We strongly support MnDOT developing an “advancing transportation equity” report (pg. 104). However, we think a least one key transportation strategy to advance equity is obvious and doesn't require further study: increased prioritization and funding of transit, bicycling and walking.
- On an expanded definition of return on investment. “Calculating return on investment is not limited to only financial considerations. It also includes social, economic and environmental factors such as safety, noise, travel time, vehicle operating costs, surrounding land use and context, air quality and wetland impacts.” (pg. 86)
- Giving “higher priority to transportation improvements in areas with complementary existing or planned land uses.” “Local parking policies can also be adjusted to rely on market-based strategies to ensure balanced supply and demand for parking.” (pg. 97)
- The emphasis on complete streets. “MnDOT is committed to the principles of complete streets. The agency has a policy that complete streets be considered in all projects along the state highway system. Partner agencies are encouraged to formally adopt a complete streets approach.” (pg. 98)
- The completion of a Health Impact Assessment (by MN Department of Health) on the plan (Chapter 5).
- Environment being seen as a top priority by stakeholders (pg. 60).

- The guiding principle to "build to a maintainable scale: consider and minimize long-term obligations—don't overbuild" (pg. 11).
- Inclusion of the new data on sidewalks and ridesharing (i.e. Lyft, Uber).

GENERAL COMMENTS

- **MnDOT should provide an executive summary to the Multimodal Plan.** While, as stated on page 6, the plan provides "overarching guidance and priorities for the entire transportation system," it is very hard to discern priorities given that the plan is 112 pages long—plus appendices—and is mostly descriptive rather than spelling out policies. This is particularly problematic when you're asking for members of the public to weigh in. At a minimum, the executive summary should spell out what is different from the previous plan and why. We are aware of the stand-alone executive summary, but that is both hard to find and serves more as a table of contents than an executive summary.

- **MnDOT should explicitly prioritize funding and policies that expand public transit, bicycling, and walking.** These options will reduce greenhouse gases and other emissions, expand affordable access and promote equity, and respond to the state's changing demographics. The plan includes "Identify and give priority to infrastructure improvements, services and education that increase the number of people who bicycle, walk and take transit" as a Healthy Communities strategy, noting that "Increasing the number of people who bicycle, walk and take transit has many benefits for Minnesota's communities" (pg. 100). On page 62 the plan indicates, "Participants were also asked about tying different types of spending to land use considerations. Generally speaking, there was support for prioritizing bicycle and pedestrian spending and safe routes to school funding in this way."

However, MnDOT's draft 20-year Minnesota State Highway Investment Plan shows a 76 percent reduction in bicycle funding vs. defined needs, leading to a deterioration of the bicycle network. Also, the draft Greater Minnesota Transit Investment Plan doesn't include a strategy for increasing the modal share of transit. Priority for transit modes could be reflected by more boldly highlighting a strategy to meet funding needs and by a more complete definition of transit needs, but the plan lacks both of these elements. In fact, the plan explicitly states that the ridership estimation model used is "not intended to serve as a planning tool for designing future transit services that could influence travel choices."

- **The overall priorities of the plan are not clear.** "The SMTP identifies overarching guidance and priorities for the entire transportation system" (pg. 6). What are the priorities? What is the overarching guidance given the plan includes no prioritization or clear accountability for the 45 strategies listed?

- **MnDOT should implement better performance measures for modes other than driving.** The current plan continues to put too much emphasis on the speed/delay of car travel. For example, on page 85, there is no performance target for improving transit access to jobs, and MnDOT's target for "state-owned sidewalk miles substantially compliant with ADA standards" is 100 percent by 2037. That's over 20 years from now! Our state can and should do better. Since 2010, the percentage of freeway miles congested during peak travel periods in the Twin Cities remained close to 20 percent, with minor fluctuations up and down (pg. 44). The plan states that "whenever possible, transportation decision-makers should focus on how many people are moved by the system not how many vehicles" (pg. 100) but it is unclear how funding priorities and performance measures will reflect this emphasis.
- **The plan should place greater emphasis on expanding intercity passenger rail.** The plan calls out the environment as a top trend category and lists a Healthy Communities strategy to "make transportation decisions that minimize and reduce total greenhouse gas emissions. Yet the plan fails to discuss the need for greater investment in intercity passenger rail and in fact provides three times as much text on automated vehicles as it does on intercity passenger rail.
- **We recommend that the two MnPASS lanes proposed be designed as take a lane, not add a lane, projects.**
- **In the section on Transportation Funding, the plan should note that without increased funding (e.g. gas tax, tab fees, metro sales tax) most of the performance measures in the plan will not be met.**

Environment

- The plan indicates that "reducing emissions will require shifting away from gas vehicles to promoting cleaner transportation options" (pg. 47), but should provide far more specificity here. In particular, the plan should spell out the need for expanded public transit and bicycling and walking connections statewide. Without this elaboration, cleaner transportation options could be interpreted to mean cleaner cars and cleaner fuels, something MnDOT has very little control over. The recent MN Environmental Quality Board Climate Strategies Report identifies that a key strategy is to "Strengthen efforts to transform land use patterns and mass transit systems to reduce reliance on single occupancy, internal combustion engine vehicle." In addition, "Environmental trends were more frequently identified as the most important area of change to plan for" (pg. 58).
- The plan includes insufficient urgency regarding reducing transportation's contribution to climate change. As noted on page 47, "the state is not on track to meet the 2007 Next Generation Energy Act targets." The plan needs to spell out transit, bicycling, and walking options as a priority to reduce greenhouse gas emissions and connect this to state goals, which include mode shift. As noted on

page 49, “Data suggests that more investment in transit, bicycling and walking infrastructure would encourage people to use these modes more often.”

- The plan is weak on land use strategies to reduce the reliance on single occupancy vehicles. The transportation-land use interaction isn’t discussed until page 62, and there is inadequate description of land use strategies and performance measures. The plan states that “the adoption of context sensitive solutions and flexible design standards” has been inconsistent (pg. 106).

Equity

- The plan defines equity as “All people have access to a health and prosperous future” (pg. 43) and notes, “The transportation system must be accessible and safe for users of all abilities and incomes” (pg. 11-13). Currently, however, a large share of jobs, approximately 75 percent in the Twin Cities metro, are not conveniently accessible unless the traveler has access to a car, which is often not the case for people of color and low-income residents (see Transit for Livable Communities, Transportation Performance Measures in the Twin Cities Region report).
- Complete Streets not mentioned until page 69.

Changing Demographics/Travel behavior

- The plan should better highlight the need for expanded transit and bicycling options given it’s finding that “Twin Cities residents are increasingly using options other than cars to travel” (pg. 49). More specifically, several times the plan notes the need to improve multimodal transportation options (pg. 88), but insufficient connection is made to the need for increased state funding.

Performance Measurement

- We recommend adding a target to the performance measure: “Average annual number of jobs accessible within a 30-minute transit commute during the a.m. peak” (pg. 85). We also recommend adding a target to the performance measure: “Annual percentage of MnDOT omnibus survey respondents perceiving safe environments for bicycling and walking” (pg. 96).
- There are significant problems with measuring congestion based on travel speed (pg. 23), particularly that this measure leaves out the role of land use (better to measure travel times, not speeds) and the impact of non-driving modes. MnDOT needs additional performance measures that capture level of service for all users and which place less priority on congestion for drivers. We don’t support defining congestion as “freeway miles below 45 miles per hour” (pg. 44) as this travel speed is not much of an inconvenience especially when compared to the lack of public transit to get to the majority of jobs in the Twin Cities metro in a reasonable period

of time. Also, the plan states that “since 2010, the percentage of freeway miles congested during peak travel periods in the Twin Cities remained close to 20 percent, with minor fluctuations up and down” bringing into question why the plan puts so much emphasis on traffic congestion.

- The plan notes that MnDOT is “struggling to keep system in state of good repair” (pg. 21), yet it is unclear how high a priority road and bridge maintenance is relative to expansion.

Thank you for taking these comments into consideration before the draft plan is finalized.

Sincerely,

Jessica Treat, Executive Director
Transit for Livable Communities

Dave Van Hattum, Advocacy Director
Transit for Livable Communities

Mathews Hollinshead, Conservation Chair
Sierra Club North Star Chapter

Manitoba



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October 14, 2016

Charles A. Zelle
Commissioner
Minnesota Department of Transportation
395 John Ireland Boulevard
St. Paul MN 55155-1800

Dear Charles A. Zelle:

I would like to thank you for this opportunity to comment on your key statewide transportation plans. Your goals for multimodal transportation, highway investments, and transit investments demonstrate your government's commitment to social, economic, and environmental well-being for the people of Minnesota. In addition, your plan provides an excellent framework for other jurisdictions to follow.

While both of our departments are mandated to improve citizen's quality of life, we also face similar challenges, such as aging infrastructure, increasing construction costs, diversifying user needs, and constraining budgets. In this context, we commend you for your strategic approach to developing a resilient and adaptive transportation framework.

Manitoba is a trading province. Our way of life relies on the friendships our communities have with our neighbours and the quality of the transportation system that connects us. To improve the resilience of our transportation system, Manitoba has been working to protect our key trading corridor, Manitoba's Highway 75, from Red River flooding by increasing its flood protection to the same standard as Interstate 29 in North Dakota. In short, when the Red River floods, Manitoba will remain open for business if I-29 is open. The highway 75 / Interstate 29 corridor connects the Pembina, ND / Emerson MB border crossing, which is the key trade gateway between your state and my province. Carrying CDN \$18 Billion in trade goods annually, this border crossing is the busiest commercial port-of-entry west of Detroit. Together with North Dakota and Canada, we are investing in this gateway so that it continues to efficiently serve our communities and businesses into the future.

I would also like to point out that our shared port-of-entry connecting Minnesota State Highway 313 to Manitoba's Provincial Trunk Highway 12, carried more than CDN \$300 million in trade between our jurisdictions in 2015. This crossing is also a key gateway for Canadian National Railway's mainline. Finally, our shared port-of-entry at Pinecreek/Piney has been selected by Canada Border Services Agency to be part of a pilot project to examine the feasibility of remote processing. While this border crossing is probably the least-used port-of-entry between our jurisdictions, the pilot project may identify innovations and opportunities to make our transportation system more efficient for the future.

My government looks forward to collaborating with you on our common interests, including prioritizing safety, strengthening international multimodal trade and tourism corridors, and strengthening border crossings. Please feel free to contact Esther Nagtegaal, Assistant Deputy Minister of Transportation Policy and Motor Carrier Divisions at 204-945-5199 or Esther.Nagtegaal@gov.mb.ca, if you would like to explore these matters further.

Thank you again for the opportunity to review your state plans and to share my views with you. Congratulations on a job well done!

Sincerely,


for Lance Vigfusson, P. Eng.
Deputy Minister

c: Honourable Blaine Pederson, Minister of Infrastructure
Esther Nagtegaal, Assistant Deputy Minister, Transportation Policy and
Motor Carrier Divisions, MI