

MnSHIP Plan Comments and Responses

SUMMARY OF MNSHIP COMMENTS AND RESPONSES

The Minnesota Department of Transportation released the draft 20-Year Minnesota State Highway Investment Plan for formal public review on August 29, 2016. Drafts of the Statewide Multimodal Transportation Plan and the Greater Minnesota Transit Investment Plan were also available for review. The public comment period was advertised in the state register, through press releases, social media and at nine in-person events around Minnesota. A public hearing was held on October 6, 2016 with opportunities for people around the state to comment via video conference facilities at MnDOT's 14 office locations around the state.

During the public comment period, MnSHIP received 150 comments from 79 individuals or organizations. This document summarizes the comments received through this process and provides MnDOT's responses to each point of feedback, where applicable.

PUBLIC COMMENT TOPICS

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SUMMARY OF CHANGES MADE TO FINAL DOCUMENT

Topic	Change made to the final document
Federal and state legislative requirements	<ul style="list-style-type: none"> • Chapter 2 page 30, paragraph 1 <ul style="list-style-type: none"> • Clarified that there are nine national goals for the NHS. • Chapter 2 page 30, paragraph 4 <ul style="list-style-type: none"> • Updated the dollar amount of funding Minnesota will receive for freight from \$10 million per year to approximately \$20 million per year. • Chapter 2 page 32, figure 2-3 <ul style="list-style-type: none"> • Clarified clause (1)
Performance outcomes	<ul style="list-style-type: none"> • Chapter 2, page 41 <ul style="list-style-type: none"> • Added a sentence to highlight that motorcycle fatalities and bicycle and pedestrian fatalities have not followed the same trajectory as total traffic fatalities. • Chapter 2, page 39 <ul style="list-style-type: none"> • Changed the text in the paragraph to accurately reflect 2015 NHS bridges in poor condition to be 3.0% • Chapter 2 page 38, paragraph 2 <ul style="list-style-type: none"> • Text changed to “Overall, the average remaining service life of all state highway pavements has increased slightly over the past 6 years as shown in Figure 2-7. • Chapter 2, page 43, paragraph 4 <ul style="list-style-type: none"> • Added reference to Figure 2-12 • Chapter 5, page 77, bullet 1 <ul style="list-style-type: none"> • Added text “Pavement condition is expected to decline significantly.” • Chapter 5, page 80, Figure 5-2, first row <ul style="list-style-type: none"> • Projected outcome text changed from “federal targets” to “federal minimum thresholds.” • Chapter 5, page 91, Figure 5-6, first row <ul style="list-style-type: none"> • Projected outcome text changed from “federal targets” to “federal minimum thresholds.” • Chapter 6 page 110, paragraph 4 <ul style="list-style-type: none"> • Text modified to clarify that progress will not be made towards ADA-compliance of rest areas.
Data	<ul style="list-style-type: none"> • Chapter 1, page 8, margin call-out <ul style="list-style-type: none"> • Updated miles driven • Chapter 1, page 11, paragraph 2 <ul style="list-style-type: none"> • Changed text to accurately reflect typical age of bridge replacements
Investment and Funding	<ul style="list-style-type: none"> • ES, page ES-4, paragraph 2 <ul style="list-style-type: none"> • Changed text to include revenue sources. • Figure ES-2, page ES-5 - Figure added

Topic	Change made to the final document
	<ul style="list-style-type: none"> • Figure ES-3, page ES-5 - Totals added to charts • Figure ES-4, page ES-6 - Totals added to chart. • Chapter 1, page 18 – “It prioritizes local and regional connections.” Was removed. • Chapter 3, page 51 <ul style="list-style-type: none"> • Added call-out in margins comparing need to revenue. • Chapter 3, page 51 <ul style="list-style-type: none"> • Figure 3-1 added and text changes to include description of figure. • Chapter 3, page 52, Figure 3-3 <ul style="list-style-type: none"> • Changed last column header to “Total of Need” • Chapter 3, page 58, paragraph 4 <ul style="list-style-type: none"> • Changed text from “\$2.56 billion” to “\$2.62 billion” • Chapter 3, page 59 <ul style="list-style-type: none"> • Changed total needs for “Other Needs” to \$6.81 billion” • Chapter 4, page 70, paragraph 3 <ul style="list-style-type: none"> • Removed “investment” • Chapter 5, page 82 <ul style="list-style-type: none"> • Figure 5-3 added showing the three phases of the investment direction as it transitions from the 2013 MnSHIP investment direction to the updated investment direction in this plan. • Chapter 5, page 83, bullet 1 <ul style="list-style-type: none"> • Text changed from “federal targets” to “federal minimum thresholds.” • Chapter 5, page 95 <ul style="list-style-type: none"> • Corrected critical connections percentage. Critical connections investments will constitute 7.3%, not 7.8%, of total 20 year plan • Figure 5-8. Corrected Twin Cities Mobility percentage. Twin Cities Mobility is 1.1%, not 0.7% of total • Chapter 6 <ul style="list-style-type: none"> • Added a line to highlight that Twin Cities Mobility remains a high risk at the end of the planning period.
Work Plan	<ul style="list-style-type: none"> • Chapter 7, page 128, bullet 4 <ul style="list-style-type: none"> • Modified text into two, separate statements
Appendices	<ul style="list-style-type: none"> • Appendix C, C-8 <ul style="list-style-type: none"> • Removed IRC from acronyms • Appendix C <ul style="list-style-type: none"> • Added a list of Intelligent Transportation Systems to the definition of ITS • Appendix F

Topic	Change made to the final document
	<ul style="list-style-type: none"> Added this appendix to illustrate how MnSHIP addresses state and federal legislative requirements. The appendix compares planned and actual capital investments over the previous five years. Appendix H <ul style="list-style-type: none"> Language added to reference US Environmental Protection Agency research and discuss the negative health impacts of minority population's proximity to the NHS system which has higher traffic levels and the potential for higher levels of NO2.
Project Delivery	<ul style="list-style-type: none"> Chapter 4, page 70 <ul style="list-style-type: none"> Updated text of paragraph to read, "A review of the investment needed to deliver projects determined that the funding used in the three approaches was too low (14 percent of the total program). MnDOT revised the analysis based on the average amount spent over the last three years and determined that spending needed to deliver projects was 16 percent of the capital program. MnDOT will use any efficiency in Project Delivery to program additional projects to maintain bridge and pavement conditions."

RESPONSES TO PUBLIC COMMENTS

Comments Related To Plan Development

GENERAL COMMENTS ON PLAN

Comment

Name/Organization	Comment
Marisol R. Simon. FTA	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 and related metrics will not be met.
Nancy Schouweiler, Dakota County	Dakota County appreciates Mn/DOT's public engagement efforts to provide information and seek input from stakeholders to help shape the MnSHIP investment direction. Dakota County generally supports a number of strategies employed by MnSHIP, including the following elements: Primary highway investments will strive to preserve the existing system. Investment in low-cost high-benefit highway projects as a cost effective approach to mitigate some operational and capacity needs across the region. Identification of the need for continued investment in selected expansion projects. including Managed Lanes. Progress toward ADA-compliant infrastructure. A section that outlines priorities for additional transportation revenues.

Response

Thank you for your comment.

DOCUMENT EDITS

No changes made.

Comments

DOCUMENT FORMATTING

Name/ Organization	Comment
Paul Martin	I cannot read the grey type on the blue background well enough to comprehend.

Response

Comment noted. To improve readability, the color of the text has been changed.

DOCUMENT EDITS

- On Figure ES-1 and Figure 1-6, changed the text from white to black to be more legible.

Comment

PLAN FORMAT

Name/ Organization	Comment
DeWayne Mareck, Sterns County Commissioner	1. Provide an easy to understand report that provides the subsidy amount for every mode (category) of transportation.2. Provide an easy to understand report that provides (for each project); the cost doing the project as scheduled vs. delaying the project.

Response

Comment noted. MnSHIP is not a project-specific plan. It details the state highway investments over the next 20-year by investment category. The plan only covers investment on the state highway system and doesn't include revenue from or for other systems.

DOCUMENT EDITS

No changes made.

Comments

SUPPORT FOR PLANNING PROCESS AND DOCUMENT

Name/Organization	Comment
Kris Riesenber, Federal Highway Administration	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.

Name/Organization	Comment
Kris Riesenber, Federal Highway Administration	The performance analysis including multiple scenarios is a quality practice.
City of Minneapolis	(No specific page number) Overall the plan is very well written and organized. The document is easy to comprehend and effectively captures the different outcomes that would be obtained depending on how state funds are prioritized and allocated.

Response

Thank you for your comments.

DOCUMENT EDITS

No changes made.

Comment

CONNECTING MNSHIP TO MINNESOTA GO VISION

Name/ Organization	Comment
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	MnSHIP's long-term goals, planning and cost estimating are tied to the vision created by the Dayton Administration in 2011 with the Minnesota GO 50 year vision and thus may be politically flawed. The MnSHIP executive summary states that the MnSHIP plan "provides a strong linkage between policies that have been formulated in the Minnesota GO 50 year vision and statewide multimodal plan both developed under the auspices of the Dayton administration. The Minnesota GO 50 year vision looks at such priorities as global warming and climate change mitigation, environmental health and justice, bicycle planning, pedestrian walk planning, and even racial equity and disparities and these and other priorities from the Minnesota GO plan are then factored in to decision making on future Minnesota transportation planning and funding.

Response

The Minnesota GO 50-year Vision was a MnDOT initiative to identify what we are trying to achieve for transportation in Minnesota. The Minnesota GO Vision does not mention global warming, climate change mitigation, or racial equity. However, these concepts are addressed in the Statewide Multimodal Transportation Plan and in Chapter 2 of MnSHIP. These concepts are also consistent with the Minnesota state goals for transportation as described in Minnesota Statute Chapter 174, Section 1, Subd. 2.

DOCUMENT EDITS

No changes made.

Comment

CONSISTENCY WITH SMTP

Name/ Organization	Comment
Jon Commers, Cara Letofsky, Katie Rodriguez, Metropolitan Council	Thank you for the opportunity to provide comment on the draft Statewide Multimodal Transportation Plan (SMTP) and Minnesota State Highway Investment Plan (SHIP). These plans are intended to serve as a long-term vision for how we as a state will invest in our current infrastructure and grow capacity for future demand and growth, and we appreciate MnDOT's commitment to plans that reflect the needs of current and future generations. MnDOT staff recently gave a presentation to the Metropolitan Council Transportation Committee detailing these two draft plans, and solicited feedback from members. There was one point in particular that we felt important to express both at the meeting, and to submit as comments on the draft plans. While pleased to see that the draft SMTP articulates a commitment to meet Minnesota's Next Generation Energy Act goals, we are disappointed that the SHIP appears not to specify how transportation investments will meet or advance the same goals. Transportation in our state generates a quarter of Minnesota's greenhouse gas emissions. Reducing emissions emitted by users of our transportation system is an essential step if we are to achieve the emissions levels to which Minnesota committed under the landmark 2007 law. The infrastructure we choose to maintain and build frames the system, and largely determines the volume of climate-altering emissions we will emit in coming decades. The two documents' inconsistency on this fundamentally important point is concerning to us, and we hope MnDOT will amend the SHIP to reflect Next Generation Energy Act commitments and find alignment with the SMTP. Thank you for your efforts to plan for the future of Minnesota and the metropolitan region in a holistic and innovative manner. We look forward to continuing to partner with you in the years to come.

Response

Thank you for your comment. The Statewide Multimodal Transportation Plan identifies a strategy to make transportation decisions that minimize and reduce total greenhouse gas emissions. However, MnDOT is still in the early stages of identifying strategies to reduce greenhouse gas emissions. Future work has been identified in the Statewide Multimodal Transportation Plan to identify and advance these strategies. These identified strategies will be incorporated into the next MnSHIP document.

DOCUMENT EDITS

No changes made.

PUBLIC OUTREACH

Comments

SUPPORT FOR PUBLIC ENGAGEMENT PROCESS

Name/ Organization	Comment
Metropolitan Council	The Council applauds the outreach completed as part of the plan, including the use of a variety of new, innovative methods intended to garner input from a wide range of stakeholders.
Douglas Loon, MN Chamber of Commerce	Thank you for the opportunity to provide comment on the DRAFT 2018-2037 20-Year State Highway Investment Plan (MnSHIP). On behalf of our 2,300 members representing businesses of all sizes, from all industries around the state, we appreciate the opportunity to offer our feedback. Minnesota's state highway system is an incredibly important asset to the state. It knits together our varied communities and provides the backbone for the movement of commerce across the state. It is appropriate, then, that you and your department spent considerable time reaching out to Minnesotans to solicit their input and feedback about how the state's highway investment resources should be spent over the next 20 years.
Edward Ehlinger, Minnesota Dept. of Health	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.
Douglas Loon, MN Chamber of Commerce	At a time when the needs for investment into our state's transportation system are increasing alongside the amount of scrutiny given to how our valuable transportation dollars are currently being spent, careful and transparent planning and forecasting is essential. We applaud you and your department for the work done to gather the public's input and assemble this report. We appreciate the opportunity to offer this feedback about the contents of the current DRAFT, and we hope that you and your team find our thoughts and comments helpful as you work to put the report into its final form.

Response

Thank you for your comment. MnSHIP is an 18 month effort to identify capital investments for Minnesota's state highway system over the next 20 years. It is completed through a data-driven and collaborative process with transportation stakeholders and the public. Thousands of Minnesotans were involved in shaping the investment direction in MnSHIP.

DOCUMENT EDITS

No changes made.

Comment

SUPPORT AND USE OF CONCLUSION FROM PUBLIC ENGAGEMENT

Name/ Organization	Comment
City of Minneapolis	Page 65: A solid community process was used to reach the conclusion that Option B is the best statewide approach to funding different types of projects. There are several funding scenarios that are presented in which the public was polled at several community meetings. Option A focuses investments on repairing and maintaining existing state highway pavements, bridges and roadside infrastructure. Option B balances investments in repairing and maintaining existing state highway infrastructure with strategic investments in improving travel time reliability. Option C focuses investments on improving travel time reliability, non-motorized investments, and regional and locally-driven priorities. While Option A is favored by outstate residents and Option C has stronger Metro-wide support, city staff concur with the majority of statewide residents and with MnDOT staff that Option B is the most prudent option; balancing asset management with improvements in mobility.

Response

Comment noted. Participants in the public outreach process preferred Approach B, no matter if they were transportation partners/stakeholders or the public. The investment direction in MnSHIP prioritizes maintaining the existing system first while making some mobility improvements. This investment direction is very similar to Approach B.

DOCUMENT EDITS

No changes made.

UPDATING PROJECTED REVENUE AND INVESTMENT DIRECTION

Comment

Name/Organization	Comment
Hennepin County	Page 21: In identifying 4 new investment categories and increasing spending in Project Delivery did MnDOT increase overall budget or just reconfigure existing investment pie?

Response

MnSHIP did not increase the overall budget because 4 new investment categories are identified. MnSHIP is a fiscally-constrained plan. It must identify priorities given current and expected funding. Revenue projections were completed before the number of investment categories was identified. When the plan is updated every four year, MnDOT develops a new revenue projection for the 20 year timeframe of the plan. In the 2013 version of MnSHIP, projected revenue from 2014-2023 was \$18 billion. During this plan update, the revenue projects in this plan were revised to reflect the projected revenue from 2018-2027 which was \$21 billion. Given the revenue projections, investments are then divided among the investment categories based on investment priority, strategies, and desired outcomes.

DOCUMENT EDITS

No changes made.

INFLATION CALCULATIONS

Comments

QUESTION OF PROJECTED INFLATION

Name/ Organization	Comment
Douglas Loon, MN Chamber of Commerce	However, as you know, when calculating the state's long term transportation funding needs, two inputs into the calculus - inflation and bridge and pavement condition targets - have a significant impact on the multi-year need numbers that are produced. With regard to the former, we continue to note that the 5% inflation factor MnDOT has historically used,4 as well as the 4.5% factor used in this update of MnSHIP, continueto be at the upper end of the range of available indexes - including industry specific indexes like the National Highway Construction Cost Index developed by the Federal Highway Administration and an index developed by the American Road and Transportation Builders Association that measures year-over-year price increases in various categories of road construction such as steel, asphalt, ready mix concrete, fuel, sand and others. As we have in the past, we would encourage the Department to continue its efforts to refine its long-term cost forecasting to ensure it tracks as closely as possible to the experience of the industry as reflected in other industry specific indexes.
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	An analysis by the Minnesota Center for Fiscal Excellence in 2015 looking at the period from 2003-2014 found glaring differences in annual inflation figures for MNDOT when compared to national averages. This 2015 analysis showed Minnesota averaged 5.7% annual increase from 2003 to 2014 while the same Federal National Highway Construction cost index averaged just 0.9% which works out to an increase over this time period in the Minnesota rate by 87.5% versus only 10.1% on the national average. MNDOT's use of a 5% inflation figure is just not even reasonable and greatly drives up the long term needs cost estimates when factored over long-term 10-20 year transportation spending plans.

Response

The inflation calculation for MnSHIP is based in large part on Minnesota's Construction Composite Cost Index (MnDOT CCI). MnDOT's CCI is 5.7 percent from 2003 to 2014. It is correctly notes that this index is significantly higher than the National Highway Construction Cost Index. However, MnDOT's CCI is in line with other state's construction cost indexes over this same time period. Furthermore, the rapid inflation in highway construction in Minnesota during the past decade is expected to continue. As a result, the decreasing purchasing power from slower-growing revenue sources will continue to challenge Minnesota and other states into the foreseeable future.

DOCUMENT EDITS

No changes made.

Comment

BETTER EFFICIENCY IN DELIVERY OF PROJECTS

Name	Comment
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	The Chamber of Commerce's submission of comments on the MnSHIP plan rekindled a number of concerns I had throughout the 2015-2016 legislative session. The inflation figures used by MnDOT continue to be the most vexing and puzzling issue. The consistent assumption by MnDOT that construction costs will rise faster than most other industry indices seems to imbue a mentality that this is a foregone conclusion and the only solution is to ask for increasing funds to cover the rising costs. I am most dismayed that there seems to be no effort within MnDOT to control this and 'bend the cost curve'. We all share in wanting to lower construction costs so that MnDOT can get more construction done with each dollar. I strongly encourage a more proactive mentality within MnDOT that seeks better usage of your own funding, whether by policy change or requests for legislative action.

Response

MnDOT is committed to maximizing the benefits of highway investment given the revenue the department receives. There are many strategies detailed in MnSHIP that describe ways MnDOT is stretching its revenue. In Chapter 7 of the plan, MnDOT describes the internal and external strategies that the department is pursuing to stretch available revenue. However, MnDOT contracts out construction projects and is subject to private industry construction costs.

DOCUMENT EDITS

No changes made.

IDENTIFYING PROJECTS IN MNSHIP

Comment

PROJECT SELECTION CRITERIA

Name/Organization	Comment
Jason Miller	When performing highway expansions for highways under 10,000 ADT, seriously consider making a 65-MPH Super-Two instead of unnecessary 4-lane expansions in order to save money and do more expansions.

Response

Comment noted. Multiple factors including safety, infrastructure condition and travel time reliability are included when identifying and designing projects. MnDOT is committed to maximizing the benefits of highway investment given its available revenue through cost-effective investment strategies. These strategies include continuing to employ high return-on-investment strategies that deliver the majority of benefits at a reduced cost.

DOCUMENT EDITS

No changes made.

Comment

LIST OF HIGHWAY AND LIGHT RAIL PROJECTS

Name/ Organization	Comment
Ellen Stevens	I find this plan far too general for an average consumer. I simply wanted to check to see that key areas were going to be improved on. I want to see the light rail expanding from Stillwater to Minnetonka, from Blaine to Bloomington. Bike paths should be in place along these routes as well. Everyplace where freeways meet there must be an interchange. At 169 and 494 they did three seasons of road work and you cannot go from 169 south to 494 west easily just by a ramp. In that same interchange if you are going 494 West you cannot take 169 south. They just completed this construction a year ago and they did not develop these entrance and exits ramps properly. Please ask the everyday citizens what they would like to see in specific zones such as this. We thankfully don't think like city engineers and could have prevented such major oversights.

Response

MnSHIP is not a project-specific plan. It details the state highway investments over the next 20 years by investment category. Light rail planning and implementation is led by the Counties in the Twin Cities metropolitan area and the Metropolitan Council. Information on their transportation policies can be found in the Metropolitan Council's 2040 Transportation Policy Plan.

DOCUMENT EDITS

No changes made.

Comment

MAP OF PROJECTS IN PLAN

Name/ Organization	Comment
Nick	Where is the work plan? I see a cost for needs and what the shortfall is. Please show a map or list of projects that are anticipated to be funded and a list of projects that will go unfunded due to the budget shortfall. People want to know specifics like what they are paying for and what they will get with additional funding. This plan is way too vague. Thanks.

Response

MnSHIP is not a project-specific plan. It details the state highway investments over the next 20-year by investment category. The investment direction in MnSHIP focuses on maintaining the existing state highway system while making limited mobility investments. Specific projects are identified in the 10-year Capital Highway Investment Plan, available here: <https://www.dot.state.mn.us/planning/10yearplan/>. This documents planned and programmed projects on the state highway system over the next 10 years.

DOCUMENT EDITS

No changes made.

Comments

I-94 CORRIDOR BETWEEN MINNEAPOLIS AND ST. CLOUD

Name/ Organization	Comment
Dale Red Grewing	Please consider funding for the I-94 corridor running from Maple Grove through St. Cloud. It is a very heavily traveled route, especially in the non-winter months. It needs to be considered in the 20-year plan, and must somehow be funded. Thank you.
Debbi Rydberg, Elk River Area Chamber of Commerce	The I-94 Corridor is one of the heaviest traveled corridors in the state. The stretch of road west of Rogers meets commuters' needs on a daily basis and priority funding for the corridor needs to be included in the 20 year plan. This corridor affects commuters, commerce and tourism and it the vital road for all of Minnesota
Deb Huschle, Gabriel Media	We are living in an area that is growing at a rapid rate. That will only become greater in the future. Th I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters needs, funding for the corridor needs to be included in the 20 year plan!,Thank you for your time.
Whitney Bina	The I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters and Minnesota resident's needs, funding for the corridor needs to be included in the 20 year plan. Thank you for considering.
Jill Brunner	Living northwest of the metro I experience traffic congestion often on I-94. During the week it is work commuters and on the weekend is lake traffic. I am troubled that this highway is not getting the investment needed for today's traffic. My concern deepens as I look into the future and see more growth along this corridor. Thank you.
Mark Geller, High Impact Training Co (a business in St. Cloud)	I hope that you all will include investment and expansion plans of the I - 94 corridor between St. Cloud and St. Michael as a high priority in the 20 year plan. It's too important and there is so much business affiliated transportation issues affiliated with I - 94 to not include it in the plan.May I please make another suggestion? Somehow, someone or maybe multiple people have to get involved in getting the legislature to discuss options of financing these initiatives, and then handhold the legislature through this process. What they did in May 2016 is not your fault. However, we can't allow their inability to manage state priorities to prevent MNDOT from moving forward with plans and initiatives that have such a far reaching impact on our state.
Duane Northagen, Wright County Economic Development Partnership	The Minnesota Department of Transportation has invited the public to submit a comment regarding the draft Minnesota 20-year Highway Investment Plan (MnSHIP). Based upon this plan the I-94 corridor is mentioned but not funding is earmarked for the highway. The I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters needs, funding for the corridor needs to be included in the 20 year plan., Wright County's population is expected to grow from 132,000 to almost 200,000 during this timeframe. Most of this population

Name/ Organization	Comment
	growth will be in the NE corner of the county near the I-94 corrido. The condition of roads and bridges will continue to worsen if adequate funding is not provided.Please add funding for the I-94 corridor into your 20 year capital investment plan.
Jim Schiffler, St Cloud Industrial Products, Inc.	The I-94 corridor is our lifeline to the metro market. Please move the improvement of the interstate highway system into, through and around Minneapolis / St Paul to the top of your priority list. Out-state companies, like ours, need efficient access to the biggest market in our region.
Bob Gartland, Pan O Gold Baking Co	Pan O Gold is a wholesale regional baker (Country Hearth Breads) with an employee base of over 1300 people. We have a major bakery in St. Cloud with up to 38 semi trucks a day delivering products around the state. We also have 140 DSD route trucks delivering product to stores within the state. A major corridor for our traffic is I94 to and through the MSP market. Movement within the Metro area has improved in recent years, but the congestion on the St. Cloud to Rogers stretch has become very pronounced and difficult during the same time. We strongly recognize the need, and encourage the deveolpment of additional lanes on the St Cloud/MSP corridor be included in the MnSHIP draft. Thank you.
Robin Alton, Pan O Gold Baking Co.	Hi, I am the President and CEO of Pan O Gold Baking Co. Our company utilizes the I94 on a daily basis with both truck and commuter traffic. The I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commercial and commuters needs, funding for the corridor needs to be included in the 20 year plan. Minnesota's population is only expected to grow, the condition of roads and bridges will continue to worsen if adequate funding is not provided. The cost to maintain and update roads is growing at a substantial rate, money needs to be provided to ensure that these roads are safe for the people who travel them on a daily basis. Thank You.
Joseph T Meunier, GeoComm	The I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters needs, funding for the corridor needs to be included in the 20 year plan. Minnesota's population is only expected to grow, the condition of roads and bridges will continue to worsen if adequate funding is not provided. The cost to maintain and update roads is growing at a substantial rate, money needs to be provided to ensure that these roads are safe for the people who travel them on a daily basis.
David Lloyd	I-94 is one of the heaviest traveled corridors in the state of MN. For this stretch of road to continue to meet residents and commuters needs, a specific line item investment needs to be included in the 20 year plan.
Jim Berge	Please, Please, PleaseThe I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters needs, funding for the corridor needs to be included in the 20 year plan.

Name/ Organization	Comment
William A. Kemp, Greater St. Cloud Development Corp	I urge you to consider funding additional traffic lanes on the I94 West corridor. The need exists for numerous reasons not the least of which is the heavy volume of traffic on the existing road. My observation is that the additional one lane added between Rogers and St. Michael has improved traffic flow and cut down on congestion. I would argue that further capacity improvements to this corridor can only help the economies of the out state regions that rely on this road. Please consider funding additional lanes.
Marv Soldner, Greater St Cloud Development Corporation	Economic growth & job creation depends on adequate highways, to move freight & for commuters & tourism. The I-94 corridor between the Twin Cities & St Cloud needs a 3rd lane in the next planning cycle.
Theresa Cervantez, Coldspring	The I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters needs, funding for the corridor needs to be included in the 20 year plan. ,Minnesota's population is only expected to grow, the condition of roads and bridges will continue to worsen if adequate funding is not provided. ,The cost to maintain and update roads is growing at a substantial rate, money needs to be provided to ensure that these roads are safe for the people who travel them on a daily basis.
Steve Hosch	The I-94 West Corridor is one of the heaviest traveled corridors in the state. For this stretch of road to continue to meet commuters needs, funding for the corridor needs to be included in the 20 year plan
Steve Bot, 1-94 West Corridor Coalition	The 1-94 Corridor Coalition is committed to a comprehensive transportation package with sustainable new funding sources that delivers projects efficiently, cost effectively and transparently . The Coalition and its members strongly recommend the 1-94 capacity expansion project from St. Michael to Albertville be not only mentioned, but funded, in the 20 year MnSHIP plan. I-94 is already a significant source of congestion and is the heaviest traveled corridor in Minnesota. The congestion however, will only worsen as Central Minnesota experiences state-leading population growth. The only way to improve commerce, safety issues, and traffic delays on 1-94 is through capacity expansion. The commuters and businesses that rely on 1-94 for travel and commerce are desperate for a solution to the current problems.The economic return along this corridor is second to none. Since the completion of Phase 1capacity expansion in 2015, the corridor has seen an astonishing 55% reduction in total vehicle delay, as well as nearly three million square feet of industrial development. The 1-94 West Corridor has been the #1 Interregional Corridor in the State of Minnesota for return on investment criteria calculation. Phase II of the expansion project was awarded \$1.4 million for preliminary design in late 2014 and is likely one of the most 'shovel ready' projects in the queue.Investment in this expansion meets and surpasses multiple MnDOT criteria and would be of great economic benefit to all of Minnesota. Given the merits of the 1-94 project, we strongly support and encourage MnDOT to include funding for the 1-94 West Corridor expansion capacity project in the 20 year MnSHIP plan.

Response

The comments note the importance of the I-94. The interstate is indeed an important and heavily travelled corridor for Central Minnesota and the state of Minnesota. While MnSHIP is not a project-specific plan, MnDOT will keep this comments under advisement. MnSHIP details the state highway investments over the next 20 years by investment category. The investment direction in MnSHIP focuses on maintaining the existing state highway system while making limited mobility investments. MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. During the MnSHIP update process, MnDOT identified a need \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years.

The investment direction in MnSHIP does provide investment for Greater MN Mobility. However, that investment is limited and would not be sufficient to fund expansion of I-94. Maintaining Interstate bridges and pavement is a priority in MnSHIP. Over the next twenty years, the I-94 corridor will receive bridge and pavement investment to keep the corridor in a state of good repair.

DOCUMENT EDITS

No changes made.

Comments

PROJECT SPECIFIC COMMENTS

Name/ Organization	Comment
Peter Huffman	we need a better transition from interstate 94 to hi way 10 ... currently, the choices are ,1) through Monticello and hi way 11,2) Clearwater hi way 224,3) hi way 15 through St Cloud, Thousands of vehicles do this every day and it's a pain in the ass ... Fridays and major holidays it's horrible. Quit the light rail and fix this!!!
Karen	This letter is meant to avert a huge mistake in building a bridge in Monticello or Monticello township over the Mississippi River. Often plans are made and things are built before the customers (taxpayers) have a chance to voice their concerns. Before these ideas get out of hand, we would like to stop plans to build a bridge within the Monticello city limits. A new bridge is needed but it must provide smooth and safe traffic flow, less congestion, less expense by using existing roads and right of ways, and an easy construction process. We are also requesting that the public be kept well informed of all plans for this project. We do not want to wake up one morning to find a bridge being built in the wrong place. Obviously, it is necessary to alleviate traffic over the existing bridge. It is also crucial to get vehicles OUT of the towns of Big Lake and Monticello in order to promote smooth traffic flow. Your decisions should NOT be influenced by the desire for commerce in either town. The majority of the massive amount of traffic using the current bridge are passing through either on their way to the east or west to work, or to go up north to their vacation spots. People are in a hurry to get to their destinations. The traffic lights and required reduced speed limits within a town causes more congestion and frustration. There are two excellent locations for a new bridge. They are: 1. To the west a bridge over the Mississippi connecting I-94, following Barton Avenue north over the river to connect with Hwy 10 and Hwy 25 west of Becker. (Rumor has it that Xcel Energy has been open to using some of their land). 2. To the east a bridge over the Mississippi from I-94 by connecting

Name/ Organization	Comment
	<p>Wright County Road 19 with Sherburne County Road 14 and then onto Hwy 10. There is already an interchange on Hwy 10 and Cty Rd 14 and County Road 19 which is within a quarter of a mile of the river. (This, however, will not eliminate ALL traffic and congestion through the town of Big Lake.) Smooth, safe traffic flow must be your TOP PRIORITY. Get the bridge out of the towns. Commuters and travelers do not want to stop on their hurried way to or from work or their vacations. With a remote bridge the locals will get to their towns and homes by using the current bridge with ease and much less congestion., ,Planning any bridge so close to the existing bridge is a mistake! Placing a bridge within Monticello or Big Lake is a mistake! There have been mistakes made by government officials before. Hopefully, you can be leaders in solving this with common sense, frugality, and foresightedness.</p>
John Roemer	<p>Making Highway 14 between Dodge Center and Waseca should be the highest priority.</p>
Pat O'Meara	<p>I am very concerned about the future of the Hwy. 36W/694S interchange once the new St. Croix River bridge is opened. Today the gridlock on 694S is extremely obvious each morning and particularly in the afternoon. When I approached a MNDOT rep about the future plans to widen this section (694S to 94) he stated there were none. I believe that this should be a high priority but it appears it will be akin to the outdated loop situation around the entire Twin Cities - especially compared to numerous other loops across the nation.</p>
Nancy Schouweiler, Dakota County	<p>Specific corridors that clearly will need attention within the MnSHIP timeframe include large sections of TH 77, TH 13, US 52, TH 3, TH 55, 1-494 , and 1-35. Several of these corridors have safety needs that warrant particular attention.</p>
Robert J. Lindall, Southwest Corridor Coalition	<p>The coalition strongly supports the new freight funding category in the MnSHIP plan. Freight movement is a major issue on US Highway 212. With growing levels of freight traffic, this corridor, which was not designed to handle the projected traffic levels, will become more dangerous and more expensive for residents and businesses as the cost of transporting products and the time spent in traffic congestion grows. We understand that the state will have limited resources for transportation investments in the future and those resources need to be directed to provide a high return on investment. Therefore, previous investments in major corridors should be maximized by making needed improvements to close gaps and target dollars to areas with clear safety problems and high growth rates. As demonstrated by the increase in business growth along the new Highway 212, the Southwest Corridor Transportation Coalition feels strongly that completing this major corridor to a four-lane facility from Chaska to Norwood Young America will improve economic development and prosperity in the region while leveraging previous investments to maximize their impact on the region. The remaining two-lane gaps need to be upgraded to four lanes to handle increasing population growth, increasing employment levels and increasing freight movement. In the coming twenty years, traffic volumes in year 2030 are forecast to increase on Highway 212 to between 21,000 and 28,000 vehicles per day, or two to three times the existing traffic volumes, exceeding the capacity of the existing two-lane facility. US Highway 212, a high-priority interregional corridor, has a high volume of truck traffic, currently estimated at 1,850 heavy trucks per day. The Southwest Corridor</p>

Name/ Organization	Comment
	Transportation Coalition and Carver County have worked to revise plans for improving US Highway 212 to reduce the level of investment required while still providing a significant return on that investment. The low-cost/high-value approach will allow for a continuous four-lane corridor, one that improves safety for all people and freight while mitigating congestion and improving access in this major commerce corridor. On behalf of the Southwest Corridor Transportation Coalition, I would like to urge MnDOT to recognize the value of needed improvements to interregional corridors like US Highway 212 and TH5 as necessary steps toward meeting the goal of improving stewardship of the system that has been developed with previous investments.
Robert J. Lindall, Southwest Corridor Coalition	Maintaining the pavement on Highway 5 and the two-lane portions of Highway 212 will not significantly reduce crashes.

Response

While MnSHIP is not a project-specific plan, MnDOT will keep this comments under advisement. MnSHIP details the state highway investments over the next 20-year by investment category. The investment direction in MnSHIP focuses on maintaining the existing state highway system while making limited mobility investments. MnSHIP is a fiscally-constrained plan and therefore cannot accommodate all needs and projects on the state highway system. During the MnSHIP update process, MnDOT identified a need \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years.

DOCUMENT EDITS

No changes made.

PERFORMANCE MEASURES AND TARGETS

Comment

SUPPORT FOR USE OF PERFORMANCE MEASURES AND TARGETS

Name/ Organization	Comment
Douglas Haeder	I commend MnDOT for its use of performance based planning. I would be concerned if MnDOT were to revise established performance targets, because of funding gaps. I believe the target is a stake in the ground that enables MnDOT to measure whether it is gaining or losing ground on any given performance measure. In my understanding there is nothing to suggest that any of the adopted performance targets are the correct value in the first place. They are simply MnDOT's best effort to reflect the relative importance of competing priorities, based on the needs and desires expressed by the transportation system users, as discovered through market research, and statistical data.

Response

MnDOT sets its targets, in part, based on public expectations for the state highway system. Any future changes in performance targets would be to better match customer expectations with system performance.

DOCUMENT EDITS

No changes made.

Comment

ADJUSTMENT OF PERFORMANCE TARGETS

Name/ Organization	Comment
Douglas Loon, MN Chamber of Commerce	On this point, we were pleased to see in the Moving Forward section of the DRAFT the discussion of MnDOT's commitment to ongoing adjustments to its performance targets in an effort to better align them with realistic expectations of system performance. We agree with MnDOT that such efforts will help to ensure MnDOT's work to manage the state highway system is supported by realistic public expectations.

Response

Comment noted. MnDOT sets its targets, in part, based on public expectations for the state highway system. Any future changes in performance targets would continue to meet that threshold.

DOCUMENT EDITS

No changes made.

Comment

MNDOT HAVING HIGHER TARGETS THAN FHWA REQUIRES

Name/ Organization	Comment
Douglas Loon, MN Chamber of Commerce	Regarding bridge and pavement condition targets , while MnDOT's aspirational bridge and pavement condition targets have changed slightly in this update of MnSHIP , its targets for the condition of interstate pavement and NHS bridges appear to exceed the targets being developed by the Federal Highway Administration. We question if the department's targets are overly aggressive and unrealistic.
Hennepin County	Page 118: Perhaps our (MnDOT/Federal?) standards for pavement condition are too high? With a roughly 90% gap in funding allotment towards mobility projects, and really only a 20% gap in pavement condition allotments, what good is a smooth road if its constantly in gridlock conditions?

Response

The Federal Highway Administration has developed minimum condition levels for Interstate pavements and NHS bridges. States not meeting these minimum condition levels will be subject to penalty provisions and have funds directed to improve condition. States are able to set their own targets. MnDOT targets exceed the minimum condition levels established by FHWA. These targets reflect MnDOT's view of desirable system conditions and are consistent with actual bridge and pavement conditions in Minnesota up until the mid-2000s. In addition, having targets that exceed the minimum thresholds allows MnDOT greater flexibility to program projects without being subject to FWHA penalty provisions.

DOCUMENT EDITS

No changes made.

Comment

FACILITIES

Comment

Name/ Organization	Comment
Hennepin County	Page ES-8: Facilities - If current condition of rest areas is 6% in good condition, perhaps we should be closing any less popular/necessary ones? Or perhaps exploring other options (fee based/selling to private sector)? Weigh scales should be a priority

Response

Facilities is a new investment category in MnSHIP. By providing adequate and properly spaced rest areas along the state highway network, MnDOT can meet the demand and expectations of the traveling public. Maintenance of rest areas has been challenging under the current investment direction. However, MnDOT is committed to stretching available revenue and maximizing performance through innovative strategies such as those identified in your comment.

DOCUMENT EDITS

No changes made.

OPERATIONS AND MAINTENANCE

Comment

Name/ Organization	Comment
Liz Workman, I- 35W Solutions Alliance	While we appreciate MnDOT's analysis on the funding gap due to construction inflation and more fuel efficient vehicles, it only focuses on the trunk highway construction budget. We suggest the plan state the potential operations and maintenance shortfall.

Response

MnSHIP details the capital investments and need on the state highway system. The current plan update does not address investments necessary to operate and maintain the system. Currently, MnDOT is only able to qualitatively identify impacts and shortfalls on operations and maintenance budget due to the 20-year capital investment direction. Through MnDOT's asset management planning, MnDOT is currently analyzing those impacts and will be able to quantitatively show the impact of the capital investment direction on MnDOT's operations and maintenance budget. In Chapter 7, MnDOT identifies this task in the work plan in order to have better quantitative information on this link.

DOCUMENT EDITS

No changes made.

Comments Related To Plan Strategies

MANAGING SYSTEM SIZE

Comments

Name/Organization	Comment
Marisol R. Simon, FTA	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.
Kris Riesenber, Federal Highway Administration	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.

Response

Comment noted. The investment direction in MnSHIP focuses on maintaining the existing state highway system while making efforts to reduce the system size through jurisdictional re-alignment of roadways. MnSHIP follows the Minnesota GO 50-Year Vision which has as one of its principles to strategically fix the system. Some parts of the system may need to be reduced while other parts are enhanced or expanded to meet changing demand.

Document Edits

No changes made.

SYSTEM PRIORITIZATION

Comments

Name/Organization	Comment
Hennepin County	Page 17: Does the FAST act prioritize Interstate over Non-Interstate NHS roads, or does not differentiate?

Response

The FAST Act includes a minimum condition performance threshold for Interstate pavement but does not otherwise prioritize Interstate over Non-Interstate NHS. There is no separate performance measure or threshold for Interstate pavement in the FAST Act.

DOCUMENT EDITS

No changes made.

ACCESSIBLE PEDESTRIAN INFRASTRUCTURE

Comments

Name	Comment
Timothy Moriarty	The dates for ADA compliance are 2037? That is absurd. Get it done by 2020. Since the legislature has not been able to pass a transportation bill for two years where is the money for improvements going to come from?
City of Minneapolis	Page 43: With regard to ADA compliance, it appears that there are funding and project timing challenges with curb-cut installations. It will take 20 years to retrofit the entire system. The City of Minneapolis is faced with similar challenges and encourages the state to identify additional funds to achieve system-wide ADA compliance for curb-cuts sooner than the 20-year horizon. The City also encourages the State to identify sidewalk gaps and deficiencies, and develop a plan to address them.

Response

The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision support investment in multiple modes of transportation on the highway system. MnDOT believes that the transportation system must be accessible and safe for users of all abilities and incomes. MnDOT is committed to the Minnesota GO Vision. MnDOT also plans to complete District Pedestrian Plans over the next few years. These plans will identify pedestrian needs for the state highway system and will add to the recently completed MnDOT sidewalk inventory.

In MnSHIP, MnDOT commits to achieving substantial compliance with the Americans with Disability Act no later than 2037. The plan includes a significant increase in accessible pedestrian infrastructure funding in order to achieve that goal. Substantial compliance with ADA requirements would have taken at least 50 years at previous investment levels.

DOCUMENTS EDITS

No changes made.

ENVIRONMENTAL JUSTICE

Comment

LADDERS OF OPPORTUNITY INITIATIVE

Name/Organization	Comment
City of Minneapolis	(No specific page number) Continue the work that has been done with the FHWA on the Ladders of Opportunity initiative, to mitigate the impacts of freeways. This will require additional resources not highlighted in this plan.

Response

The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision support many of the same principles as the Ladders of Opportunity initiative. The Minnesota GO Vision is for a multimodal transportation system that maximizes the health of people, the environment and our economy. MnDOT is committed to achieving the Minnesota GO Vision.

DOCUMENT EDITS

No changes made.

Comment

ENVIRONMENTAL JUSTICE ANALYSIS

Name/Organization	Comment
Marisol R. Simon, FTA	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.

Response

In the Appendix H (Environmental Justices Analysis), MnSHIP has update language with references to the results and discussion related to the research referenced in the comment (Clark, et al.). Language changes focus on the negative health impacts of minority population's proximity to the NHS system which has higher traffic levels and the potential for higher levels of NO₂ concentration. Since racial disparities currently exist, the text was clarified to note that there is an existing risk of disproportionate impacts on traditionally underserved communities. MnDOT must ensure that the actions taken to implement the investment direction and select projects do not result in disproportionately high and adverse impacts.

DOCUMENT EDITS

- Appendix H, page H-32 and H-35
 - Language added to reference US EPA research and discuss the negative health impacts of minority population's proximity to the NHS system which has higher traffic levels and the potential for higher levels of NO₂.

Comments Related To Investments

GENERAL INVESTMENT COMMENTS

Comment

GENERAL SUPPORTIVE FOR INVESTMENT PRIORITIES

Name/Organization	Comment
Jennifer Harmening Thiede, Micky McGilligan, Sarah Smith	I'm emailing today to comment on MnDOT's draft Minnesota State Highway Investment Plan. I care about moving Minnesota's transportation future in the right direction with this plan and have mixed feelings about some of the priorities it's setting for the next twenty years. Thank you for taking these comments into consideration before the plan is finalized: 1) I am very glad that MnDOT acknowledges public desire to prioritize maintenance in the face of limited funds. As the plan states: Stakeholders and the public generally agreed that any extra funding MnDOT receives for capital improvements on the state highway network should be spent maintaining and repairing MnDOT's existing assets.
Douglas Loon, MN Chamber of Commerce	For our part, the Minnesota Chamber of Commerce has long advocated for investment in our transportation infrastructure that first prioritizes the maintenance of the system we have and then focuses on strategic enhancements to it. Not surprisingly, MnDOT's, public engagement efforts found that this is also the preferred approach of most Minnesotans. We agree with MnDOT's decision to use it as the basis for its decisions about how to invest its expected revenues over the next 20 years.

Response

MnDOT has long promoted asset management in planning and prioritizing projects. MnSHIP supports the guiding principles of the Minnesota GO 50-year vision, including building to a maintainable scale. The investment direction in MnSHIP prioritizes maintaining the existing system which is consistent with public and stakeholder input.

DOCUMENT EDITS

No changes made.

Comment

INVESTMENT NEED GAP

Name/ Organization	Comment
Nancy Schouweiler Dakota County	MnSHIP addresses the difficult task of establishing the priorities for maintaining and improving the State's transportation system. We acknowledge this task is becoming increasingly difficult considering the growing need to invest in preservation of the existing system coupled with mobility needs due to future growth in the region, while recognizing the limited transportation funding envisioned to be available. The growth in the 20 year funding gap from \$12 billion to \$18 billion since the last MnSHIP just four years ago is alarming.
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	Finally, I have grave concerns with the MnDOT planning process when the long term "needs" of the state system rise from \$600M per year to \$900M per year in just 4 years. So if we had passed the major transportation funding bill the governor and MNDOT wanted last year, we would turn around now only to learn we are \$300M a year short. This once again shows no confidence in MnDOT and its "needs" estimates.
Marisol R. Simon, FTA	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.

Response

MnDOT is committed to maximizing the benefits of highway investment given its available revenue through cost-effective investment strategies. These strategies include continuing to employ high return-on-investment strategies that deliver the majority of benefits at a reduced cost. While the new MnSHIP projects an additional \$3 billion revenue over the previous MnSHIP completed in 2013, needs on the system have grown by \$9 billion based on the following:

- Investments not keeping pace with need over the last four years resulting in increased costs for deferred maintenance (+\$3 billion)
- Increased impacts of inflation as the years change from 2014-2033 to 2018-2037 (+\$3 billion)
- A more accurate assessment of the actual cost of program and project delivery including real estate costs, engineering, and consultant support (+\$2 billion)
- Applying program and project delivery costs to a larger need number (\$1 billion)
- An additional \$3 billion in revenue from the FAST Act and projected revenue growth from state sources which partially offsets the growth in investment need (-\$3 billion)

DOCUMENT EDITS

- No changes made.

Comment

HIGHLIGHTING OF INVESTMENT NEED

Name/ Organization	Comment
Metropolitan Council	The fact that the need is \$39 billion and revenue is \$21 billion should be more prominently displayed. The big picture story is inconsistent and is hard for the reader to follow.

Response

During the MnSHIP update process, MnDOT identified a need of \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. The description of the investment need is located in Chapter 3 and the discussion of the revenue available is located in Chapter 2. The plan has been updated to include a figure in Chapter 3 that compares the revenue available and the investment need over the next twenty years.

DOCUMENT EDITS

- Chapter 3, page 48
 - Added a Figure 3-1 in Chapter 3 that compares the revenue available and the investment need over the next twenty years.

SYSTEM STEWARDSHIP INVESTMENTS

Comment

BRIDGE CONDITION INVESTMENT

Name/ Organization	Comment
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	Another aspect to look into is aesthetics. With limited dollars is it really necessary, as your office of Bridges and Structures noted in its aesthetic guidelines, that it was reasonable for a type "A" (more expensive, higher profile) bridge to cost an additional 15% above a conventional bridge due to aesthetics? A type "B" lesser important structure may only cost 10% more. When you take a lot of 10% and 15% increases over conventional costs one could say this adds up to real money. Not to mention the planning to incorporate and the extra costs to accommodate multi modal transportation needs into these structures and the additional costs this adds to these projects.

Response

At the beginning of 2015 the bridge office began reviewing the cost of aesthetics and developed a consistent method for estimating those costs. This new method for estimating aesthetics incorporates the additional costs due to increased construction difficulty and design as part of the percentage allowable for aesthetics. These changes have already been instituted and are expected to be published the next time the Cost Participation and Maintenance Responsibilities Manual is updated. Since this new and consistent approach was adopted, many local units of government have needed to add additional funding in order to achieve the desired aesthetics on their projects.

During our review, we did evaluate the allowable amounts for aesthetic costs and determined them to be reasonable for level A structures. Minnesota does not have many level A structures. We reserve this classification for bridges that are highly visible, sometimes political, and often times they have historic impacts. For example, when looking at the bridges that are currently scheduled for preliminary design for 2017 & 2018 lettings, approximately 60% are level C, 40% are level B, and zero are level A.

We also do not need to spend the entire allowable amount. MnDOT practices a context sensitive approach to aesthetics, which means that we try to design the bridge to fit within its surroundings. As a result, most of the bridges that MnDOT constructs do not use the entire allowed amount. The percentages are maximums, not goals that we try to reach. For example, Level C structures are the majority of what we build and are allowed 5% with a maximum of \$200,000 for aesthetics, but most of them will have no aesthetics added and will use no additional money because the surroundings do not warrant it. MnDOT would also like to note that level B structures receive up to 7% for aesthetics, not the 10% mentioned.

In April, MnDOT also released our first policy on the incorporation on public art on MnDOT right of way. This policy further clarifies the difference between aesthetics and public art. The policy dictates that public art and all of its associated costs and maintenance, are the responsibility of the local unit of government. This will also further reduce the amount of money that MnDOT has been spending on aesthetic enhancements in the past.

[.DOCUMENT EDITS](#)

No changes made.

Comment

INVESTMENT IN SHORT-TERM FIXES

Name/Organization	Comment
Hennepin County	Page 85: System investment is disconcerting. Claims that 'short-term' fixes may be necessary? Is this suggesting that we do not even have funding necessary to adequately maintain existing system?

Response

During the MnSHIP update process, MnDOT identified a need of \$39 billion with revenue of \$21 billion over the next twenty years. Of the \$39 billion in need, \$21 billion was necessary to meet system condition targets and key objectives. It would take all of MnDOT's revenue over the next 20 years to meet infrastructure performance targets on the highway system. Pavement conditions and, to a lesser extent, bridge conditions are expected to decline significantly over the next 20 years.

[DOCUMENT EDITS](#)

No changes made.

Comment

JURISDICTIONAL TRANSFER

Name/ Organization	Comment
Metropolitan Council	After recently completing a multi-year, statewide Jurisdictional Transfers Study, it is surprising that more funding is not allocated to this area in an attempt to right-size MnDOT's system and reduce long-term costs for the agency. A dollar value of savings resulting from the transfer should be provided to illustrate this investment can produce savings over 10, 20, or 40 years.
Hennepin County	Page 85: Load posting or restricting heavy vehicles may seem to suggest an accelerated movement towards jurisdictional turnback efforts, despite limited budget for jurisdictional transfers?
Hennepin County	Page 109: Jurisdictional Transfers will only receive 10% of the estimated 20 yr. needs. This seems like an area where more investment now could result in long-term savings by getting these roadways out of your system? Seems that this section should not be cut so drastically
Kris Riesenbergl, Federal Highway Administration	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.

Response

Jurisdictional Transfer is a new investment category identified for MnSHIP. MnDOT believes it is a key strategy to managing the state roadway system effectively. However, there are many competing needs on the state highway system. During the MnSHIP update process, MnDOT identified a need \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. The investment direction in MnSHIP focuses on maintaining existing infrastructure on the state highway system. Maintaining the system covers 70 percent of MnDOT's expected revenue over the next twenty years leaving little revenue available for other investment priorities.

MnSHIP work plan located in Chapter 7 includes a task to quantify the benefits of jurisdictional transfer. Completing this analysis will give MnDOT more information about the short-term and long-term capital savings associated with transferring roadways.

Currently, \$50 million of the truck highway fund "flexible funds" is used to facilitate jurisdictional transfers. The additional investment through MnSHIP in Jurisdictional Transfer may be small, but is a more flexible source of funding that will allow for funding of pre-transfer work that the "flexible funds" are not eligible for. This will assist in moving forward on many transfers that were on hold pending pre-transfer work.

DOCUMENT EDITS

No changes made.

Comment

PRIORITIZATION OF ROUTES IDENTIFIED AS JURISDICTIONAL TRANSFER CANDIDATES

Name/ Organization	Comment
Hennepin County	Page 40: Where do Central Ave, University Ave, TH 101 rank in MnDOT priority of Jurisdictional Transfers? Any 'Track 0'?

Response

All of these corridors were identified as high priority to remove from the state highway system, however the probability of transferring jurisdiction is relatively low so they were not identified as Track 0 corridors.

DOCUMENT EDITS

No changes made.

Comment

COMBINATION OF FACILITIES AND ROADSIDE INFRASTRUCTURE

Name/ Organization	Comment
Kris Riesenberg, Federal Highway Administration	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.

Response

Facilities is a new investment category in MnSHIP. Prior to MnSHIP, rest areas and weigh stations were funded through Small Programs category. The separating of Facilities and Roadside Infrastructure demonstrates the difference in how MnDOT invests in these two assets. Facilities which includes rest areas and weigh stations has been challenging under the current investment direction. Due to limited investment in rest areas and weigh stations through district flexible funding, these assets have been recently received funding under Small Programs. Funding is centrally managed and projects are selected by Central Office staff. Roadside Infrastructure investment is mainly made through pavement projects and identified at a district level. Creating a facilities investment category allows for greater transparency in project selection for these projects as well as dedicated and predictable funding for those investments which traditionally were not receiving funding at a district level.

DOCUMENT EDITS

No changes made.

Comment

CONCERN OF FINANCIAL BURDEN BEING TRANSFERRED TO LOCALS THROUGH JURISDICTIONAL TRANSFERS

Name/ Organization	Comment
City of Minneapolis	Page 13: Jurisdictional transfers are mentioned throughout the document as a stewardship management strategy. While this may reduce the state's financial burden it should be noted that local agencies will need to reprioritize or reallocate resources to take on additional infrastructure. This will result in accelerated deterioration of local systems if additional local resources are not identified.

Response

Jurisdictional transfer allows for a better alignment of roadway ownership with roadway function and agencies' priorities. MnDOT believes it is a key strategy to managing the state roadway system effectively. However, MnDOT plans to transfer roadways with a city or county agency only if both MnDOT and the city or county agency agree upon the terms of the transfer.

DOCUMENT EDITS

No changes made.

Comment

PAVEMENT CONDITION

Name	Comment
Jason Miller	The plan looks good considering the limited budget. The Performance-Based Practical Design Initiative is the way to go as proven by many other states, and it's good that MnDOT included this in the plan. Pavement and Bridge maintenance projects should always come first ahead of any reconstruction or expansion projects, and I saw that was included which is good. The one thing I noticed missing from this plan is Preventative Maintenance strategies, such as micro, scrub, and chip-sealing and even crack sealing which are all crucial to extend the overall life of the pavement on a given roadway. Same year chip sealing to paving is especially beneficial. St Louis County is a great example for implementing Preventative Maintenance techniques on their county and county state-aid highways. Please include Preventative Maintenance when planning your future budget. Otherwise, the overall plan looks positive considering the limited budget!

Response

Thank you for your comment. MnDOT agrees that preventive maintenance is an important investment strategy maintain pavement condition. Preventive maintenance projects are completed with capital revenue identified in MnSHIP and through operations and maintenance revenue at the district-level

DOCUMENT EDITS

No changes made.

Name/ Organization	Comment
Metropolitan Council	Overall, pavement conditions are predicted to decline to close to eight percent by 2025. This is a key conclusion but it seems to get lost. While what happens by 2025 for pavement is discussed, a similar discussion is not provided for bridges. It seems the reader will expect this information given the earlier discussion.

Response

Comment noted. The text you are referencing is incorrect and has been changed in the final document. Investment outcomes for all investment categories are presented in Chapter 5.

DOCUMENT EDITS

- Chapter 2 page 38, paragraph 2
 - Text changed to “Overall, the average remaining service life of all state highway pavements has increased slightly over the past 6 years as shown in Figure 2-7.”

Comment

INTELLIGENT TRANSPORTATION SYSTEMS

Name/ Organization	Comment
City of Minneapolis	Page 14: Intelligent Transportation Systems (ITS) is called out in bold within the text. More detail should be provided on what technologies are being considered to improve safety and mobility.

Response

Thank you for providing this comment. The plan has been updated to add language to ITS in Appendix C.

DOCUMENT EDITS

- Appendix C: Acronyms and Glossary
 - Added a list of Intelligent Transportation Systems to the definition of ITS in Appendix C.

TRANSPORTATION SAFETY INVESTMENTS

Comment

TRAVELER SAFETY INVESTMENT

Name/ Organization	Comment
Metropolitan Council	For being a stated priority in Minnesota Go, Toward Zero Deaths Initiative, and the 2040 Transportation Policy Plan, Traveler Safety does not seem to be prioritized from a funding perspective (i.e., only 3.2% of future funds). While all projects will be built with safety in mind, specific, stand-alone safety investment should still be prioritized. Many of these types of investments are small

Name/ Organization	Comment
	low cost items such as guardrails, cable median barriers, reduced conflict intersections, rumble strips, etc. We see an opportunity to increase funding in this investment area to meet our stated goals.
Hennepin County	Page 91-92: Will there be any targeted safety program replacing TZD, or additional funding enveloped into HSIP? Unclear to what extent TZD efforts will be maintained?
Robert J. Lindall, Southwest Corridor Coalition	Safety on our roadways is another area that should receive more attention in this plan. High crash rates on Trunk Highway 5 and the two-lane segments of Highway 212 and other major corridors continue to leave too many fatalities and injuries.
Robert J. Lindall, Southwest Corridor Coalition	Improving livability in the region will require investments that reduce crashes and improve safety on our roadways. While spot improvements are important, expanding highways with higher traffic volumes to 4 lanes provides the highest safety benefit. As noted in the Crash Facts report from the Department of Public Safety, most fatalities occur on 2-lane highways.
Robert J. Lindall, Southwest Corridor Coalition	Clearly, safety is a critical component of livability but the plan is short on investments and plans to reduce crashes

Response

Traveler Safety continues to be a priority for both MnDOT and the travelling public. MnDOT will continue to participate in the Towards Zero Deaths partnership. However, MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. MnSHIP continues investment in new safety improvements over the next 20 years through \$670 million in Traveler Safety investment category. Maintenance of existing safety infrastructure is maintained as a part of Roadside Infrastructure. Project identification is not within the scope of MnSHIP. Project selection occurs through the 10-Year Capital Highway Investment Plan which is updated annually.

DOCUMENT EDITS

No changes made.

CRITICAL CONNECTION INVESTMENTS

Comments

INCREASE BICYCLE INFRASTRUCTURE INVESTMENT

Name/ Organization	Comment
William White, University of Minnesota Medical School	Please restore funding for bicycle infrastructure in the coming budget plans. Bicycling is superior to car commuting for both the health of our environment (locally and globally) and the health of our populace (which means the health of our state coffers). As someone who has been hit twice by cars while riding in a law abiding fashion, I feel strongly that further infrastructure is needed to make bike commuting both safe and sufficiently incentivized.
Mathias Rechtzigel	I moved to South Minneapolis so that I would have easy access to many bicycle related commuting and traveling options. I am able to bike from my house to St. Cloud to Fergus Falls. If the bicycle options deteriorate with the budget cuts I may have to reassess my options. Please reconsider the budget cuts to your plan.
Lindsey Wallace	I'm strongly opposed to the restriction of funds for bicycle infrastructure in this plan when compared to the 2012 plan. Bicycling is a critical mode of transportation in our state as it improves health outcomes, reduces pollution, and provides an alternate mode of transportation that alleviates congestion. I am opposed to restricting bicycle funding as a public health professional and as a Minnesotan who regularly bicycles for transportation. Minnesota, the Twin Cities, and Minneapolis are all renowned as great places to ride a bike. Do not move us backwards by reducing the amount of funding allocated for bicycle infrastructure. Please amend this plan to at least match, and ideally exceed, 2012 levels of funding for bicycle infrastructure so we can have a forward-thinking and progressive state that does not rely solely on automobiles to get around.
Lew Overhaug	Reductions in bicycle infrastructure that result in deterioration of the system and negatively impact bicycling in MN are unacceptable. Healthy Communities should be what our transportation system is really about and what it ultimately supports. This area should be better funded and go beyond the TED program to accommodate local priorities.

Name/ Organization	Comment
Jennifer Harmening Thiede, Micky McGilligan, Sarah Smith	3) Under current funding levels, the plan projects a deterioration of the bicycle network. Given state goals, and recent travel trends, this is not acceptable and can be remedied by reasonable increased investment. Unfortunately, in this twenty-year plan, bicycle project investment falls 76% vs. defined needs. MnDOT's own Health Impact Assessment states that the department should continue to work toward shifting travelers to active transportation modes by providing convenient, safe, and connected walking, biking, and transit infrastructure.
Edward Ehlinger, Minnesota Dept. of Health	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.

Response

The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision support investment in multiple modes of transportation on the highway system. MnDOT believes that the transportation system must be accessible and safe for users of all abilities and incomes.

MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. During the MnSHIP update process, MnDOT identified a need of \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years. The investment direction in MnSHIP prioritizes maintaining the existing system which is consistent with public and stakeholder input. Increased need and investment in pavement and project delivery a reduction in other investment categories. A choice was made to reduce bicycle investment along with RCIP.

In addition, MnSHIP only addresses investments within the right of way of the state highway system. Much of the bicycle system resides on county or city roads, not the state highway system. There are several other funding sources available to support bicycling in the state.

Over the next few years, MnDOT will work to improve its bicycle planning and tracking of bicycle investments on the state highway system. The MnSHIP work plan located in Chapter 7 includes a task to improve bicycle investment reporting and project scoping of MnDOT investments. MnDOT also plans to complete district-level bicycle investment plans to identify priority bicycle investments for each MnDOT district.

DOCUMENT EDITS

No changes made.

Comment

DROP MULTIMODAL INVESTMENTS

Name/Organization	Comment
Colleen	Drop the bikes and pedestrian and regional and concentrate on roads! MN is a car state, like it or not. We need safe roads as a necessity. The rest are just nice to haves.

RESPONSE

MnSHIP supports the vision for an integrated multimodal transportation system established in The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision. MnDOT believes that the transportation system must be accessible and safe for users of all abilities and incomes. People walking and biking are legal users of roads in Minnesota. The transportation goals established in state statute also support investment in bicycling and walking infrastructure. One goal is “to provide multimodal and intermodal transportation facilities and services to increase access for all persons and businesses.

DOCUMENT EDITS

No changes made.

Comment

GREATER MINNESOTA MOBILITY INVESTMENT

Name/Organization	Comment
Edward Ehlinger, Minnesota Dept. of Health	Greater Minnesota mobility is key to helping rural populations, especially communities living a distance from goods and services.

Response

MnDOT agrees and in this MnSHIP update identified roughly \$25 million to address mobility through low-cost, high benefit mobility projects in Greater Minnesota. The previous version of MnSHIP did not identify mobility funding for Greater Minnesota. In addition, the TED program will continue through the 20-year timeframe of this plan providing funding for transportation improvements which will have an economic development benefit, many of which will improve mobility in greater Minnesota.

DOCUMENT EDITS

No changes made.

Comment

LACK OF INVESTMENT IN TWIN CITIES MOBILITY

Name/ Organization	Comment
Liz Workman, I-35W Solutions Alliance	Overall our members are disappointed by the lack of resources directed to congestion and mobility needs in the Twin Cities. 35W is the state's most heavily traveled corridor, yet funds are still lacking for the Alliance's highest priorities. The state's share of funds for the Orange Line Station at Lake Street and 35W/Lake Street Access Project, including the bridgework and entrance and exit ramps, are urgently needed. The reconstruction of the I-494/I-35W interchange would consume more than the entire amount allocated in the next 20 years for Twin Cities Mobility in the draft MnSHIP. This interchange, constructed in the 1950s, is our state's busiest and is ranked the 17th worst commute in the U.S. by the Federal Highway Administration.
Liz Workman, I-35W Solutions Alliance	The Alliance would like the investment increased for Twin Cities Mobility in the new MnSHIP. The draft report identifies a \$18 billion funding gap over the next 20 years and has significantly less funding to meet mobility needs. The last plan had a goal of \$520 million for Twin Cities Mobility (3.5%), but this draft only has \$240 million (1.1%), compared to a need of \$4.58 billion in investment over the same time period and to \$520 million over 20 years for Twin Cities Mobility (2.8% of total investments) in the last MnSHIP.
Brad Aho, I-494 Corridor Commission	The current MnSHIP draft includes \$240 million over the next 20 years for Twin Cities Mobility, or 1.1% of total investment. This is compared to a calculated need of \$4.58 billion in investment over the same time period and to \$520 million over 20 years for Twin Cities Mobility (2.8% of total investments) in the previous MnSHIP that covered 2014-2033. The I-494 Corridor Commission strongly supports investments in Twin Cities Mobility and would like the investment increased. Investments in the category of Twin Cities Mobility reduce congestion, increase reliability, and provide high rates of return in the form of economic development.
Nancy Schouweiler, Dakota County	We recognize that a dramatic shortage of funding and Mn/DOT's aging infrastructure are the underlying factors that restrict the MnSHIP direction to mainly preservation projects over the next 20 years, but this MnSHIP plan needs to reasonably account for traffic demands associated with planned growth in the Twin Cities region.

Response

MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. During the MnSHIP update process, MnDOT identified a need of \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years. The investment direction in MnSHIP prioritizes maintaining the existing system which is consistent with public and stakeholder input. The investment in Twin Cities Mobility in the last MnSHIP ended in 2023. This plan continues that investment through 2023 but does not add more investment in Twin Cities Mobility.

DOCUMENT EDITS

No changes made.

Comment

COMPETITIVE SOLICITATION FOR MOBILITY PROJECTS

Name/ Organization	Comment
Hennepin County	Page 118: Perhaps if Twin Cities and Greater MN applicants are allowed the opportunity to bid on 'provisional' mobility projects beyond 2023 it would create political pressure necessary to increase funding?

Response

MnSHIP is a fiscally constrained plan and only identifies investments based on the amount of revenue projected to be available. MnDOT typically does not prepare projects for delivery that are not funded. However, the Corridors of Commerce program did fund preliminary engineering work for a few mobility projects in anticipation of additional revenue.

DOCUMENT EDITS

No changes made.

Comment

LACK OF TWIN CITIES MOBILITY AND SAFETY INVESTMENT

Name/ Organization	Comment
Nancy Schouweiler, Dakota County	However, Dakota County is very concerned about the lack of investment identified for safety and mobility needs in the Twin Cities metropolitan area. This MnSHIP includes a significant reduction from previous MnSHIP plans to an already woefully underfunded mobility program. The inability to address safety, operational, and mobility issues on State highways in the County will have a direct effect on the safety, economic growth, and quality of life of those that will live and work in Dakota County over the next 20 years.

Response

MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. During the MnSHIP update process, MnDOT identified a need of \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years. The investment direction in MnSHIP prioritizes maintaining the existing system which is consistent with public and stakeholder input. The investment in Twin Cities Mobility in the last MnSHIP ended in 2023. This plan continues that investment through 2023 but does not add more investment in Twin Cities Mobility. MnSHIP continues investment in new safety improvements over the next 20 years through \$670 million in Traveler Safety investment category. MnDOT will continue to employ low-cost, high-benefit safety improvement projects at sustained crash locations in order to work towards the state's Towards Zero Deaths traffic safety initiative.

DOCUMENT EDITS

No changes made.

Comment

MNPASS CORRIDORS

Name/ Organization	Comment
Hennepin County	Page 95: Are the 2 MnPass lanes referenced programmed as of yet 2018-2023? What is beyond the 2016-2017 sections of 35W and 35E?

Response

The two MnPASS lanes identified in MnSHIP are included in the 10-year Capital Highway Investment Plan in years 2018-2023. These MnPASS lanes are on I-35W North of Highway 36 and I-94 between Minneapolis and St. Paul.

DOCUMENT EDITS

No changes made.

Comment

TAKING A LANE FOR MNPASS

Name/ Organization	Comment
Jennifer Harmening Thiede, Micky McGilligan, Sarah Smith	2) MNDOT's plan for two additional MnPASS lanes should use a take a lane, not add a lane, approach. See the San Francisco study: http://www.transformca.org/transform-blog-post/transform-wins-transitcenter-grant

Response

In most circumstances, converting an existing lane to a MnPASS lane would make congestion worse in the remaining lanes. As a result, overall corridor performance would be degraded despite the benefits from the MnPASS lane. In a few circumstances where congestion might not increase significantly in the remaining lanes, MnDOT does consider such conversions. MnSHIP, however, is not a project-specific plan. It details the state highway investments over the next 20-year by investment category. Specific projects are identified in the 10-Year Capital Highway Investment Plan.

DOCUMENT EDITS

No changes made.

Comment

EXPANDING MNPASS SYSTEM

Name/ Organization	Comment
City of Minneapolis	Page 16: It is recommended that the state continue to aggressively pursue managed lanes throughout the region to help promote more reliable travel times, faster emergency response times, and more reliable transit service. While significant funding has been identified to expand the MnPASS program, the plan should call out an additional action item for MnDOT to work with cities, counties, the Met Council, and CTIB to come up with funding strategies to maximize FHWA and FTA funding for MnPASS wherever possible.

Response

MnPASS is a key strategy to manage congestion in the Twin Cities metropolitan area in MnSHIP and the 2040 Transportation Policy Plan. MnDOT and the Metropolitan Council worked collaboratively to identify Twin Cities mobility strategies such as the creation of a system of managed lanes. MnSHIP's focus on maintaining the existing state highway system to a state of good repair limits the amount of money available for Twin Cities mobility projects.

DOCUMENT EDITS

No changes made.

Comment

COMPARING INVESTMENT IN TWIN CITIES MOBILITY TO OTHER CATEGORIES

Name/ Organization	Comment
Metropolitan Council	Investment priority levels in four areas raise questions, specifically the lack of funding for Twin Cities Mobility. Accessible Pedestrian Infrastructure \$530M, Twin Cities Mobility \$240M, Regional and Community Improvement Priorities \$310M and Small Programs \$600M. All of these areas could use more revenue but when compared to one another, there appears to be questions of priorities. For instance, Accessible Pedestrian Infrastructure is 2.2 times Twin Cities Mobility investment. Small Programs is 2.5 times TC Mobility investment. The discussion should also point out that the Twin Cities Mobility need is the highest of all the investment categories at \$4.58 billion.

Response

MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. The plan includes a significant increase in accessible pedestrian infrastructure funding in order to achieve substantial compliance with the legal requirements of the Americans with Disabilities Act no later than 2037. Substantial compliance with ADA requirements would have taken at least 50 years at previous investment levels. Other investments in MnSHIP such as Regional Community Improvement Priorities and Small Programs are limited to programs with dedicated revenue such as the Transportation Economic Development Program and smaller, specialized programs.

Twin Cities Mobility investment is important to maintain the travel time reliability of the highway system in the Twin Cities. The plan will be updated to highlight that Twin Cities Mobility remains a high risk at the end of the planning period.

DOCUMENT EDITS

- Chapter 5, page 111
 - Added a line to highlight that Twin Cities Mobility remains a high risk at the end of the planning period.

HEALTHY COMMUNITY INVESTMENTS

Comment

TRANSPORTATION INVESTMENTS TO SUPPORT ECONOMY

Name/Organization	Comment
Steve Hosch	Please start spending money on the things that will grow our economy

Response

Comment noted. Furthering the state's economic competitiveness is one of the three goals of the Minnesota GO Vision. The vision states that the transportation system should enhance and support Minnesota's role in a globally competitive economy as well as the international significance and connections of Minnesota's trade centers. Additionally, transportation should attract human and financial capital to the state. MnSHIP translates the Minnesota GO Vision and the objectives of the State Multimodal Transportation Plan into an investment direction.

DOCUMENT EDITS

No changes made.

Comment

MORE INVESTMENT IN TED AND CORRIDORS OF COMMERCE PROGRAMS

Name/Organization	Comment
Robert J. Lindall, Southwest Corridor Coalition	Thank you for this opportunity to comment on the Draft Minnesota Highway Investment Plan. The members of the Southwest Corridor Transportation Coalition appreciate the challenges that the state faces in improving the transportation system with limited dollars. The return on investment for strategic highway improvements that increase economic activity will result in benefits over and above the cost of these investments. Working with local businesses and community leaders, important projects can be identified as we have experienced with investments made through the TED program and Corridors of Commerce. Our Coalition believes that more emphasis should be placed on these types of investments.

Response

MnSHIP continues previous levels of investment in the TED program. Should more funding be available, opportunities to expand the amount of funding dedicated to the program would be considered. The Minnesota State Legislature created the Corridors of Commerce Program.

DOCUMENT EDITS

No changes made.

Comment

COMBINING TED PROGRAM WITH OTHER PROGRAMS

Name/Organization	Comment
Hennepin County	Page 44: The 'TED' program and 'Corridors of Commerce' seem like duplicative efforts? Any plan to combine them?

Response

TED and Corridors of Commerce are programs created by the legislature. Each program has separate legislative requirements for project eligibility and prioritization criteria. The funding source for each program is also different. Given these separate requirements and funding sources, MnDOT will continue to run these programs separately.

DOCUMENT EDITS

No changes made.

Comment

ALIGNING TED PROGRAM AND FREIGHT PROGRAM FUNDING

Name/Organization	Comment
Kris Riesenber, Federal Highway Administration	Aligning the TED program with the freight funding could improve the effectiveness of both programs.

Response

Comment noted. MnDOT's Office of Freight and Commercial Vehicle Services is currently developing MnDOT's Freight Investment Plan which will identify and prioritize investments for the federal freight funding. The details of project selection and prioritization for this program have not been established yet.

DOCUMENT EDITS

No changes made.

Comment

INCLUSION OF HEALTHY COMMUNITIES INVESTMENT OBJECTIVE

Name/ Organization	Comment
City of Minneapolis	Pages 19-20: The City commends MnDOT for including an objective that values healthy communities, which is defined as fiscally responsible decisions that respect and complement the natural, cultural, social, and economic context. Integrate land uses and transportation systems [that] leverage public and private investments. The document also recognizes the impacts of climate change and what must be done to mitigate weather impacts. With regard to natural environments it is recommended that that state set sustainability goals to reduce road salt usage, to increase pollinator plantings within its right-of-way, and use solar and LED technology where possible. Funds used to construct bicycling and walking projects that serve all user groups have been proven to increase non-motorized mode share, thereby reducing carbon emissions.

Response

Thank you for your comment. MnSHIP advances the Minnesota GO Vision of a transportation system that maximizes the health of people, the environment and the economy. The Statewide Multimodal Transportation Plan includes strategies to identify risks to the transportation system and prioritize mitigation and response activities.

DOCUMENT EDITS

No changes made.

Comment

INCREASED INVESTMENT IN REGIONAL AND COMMUNITY IMPROVEMENT PRIORITIES

Name/ Organization	Comment
Robert J. Lindall, Southwest Corridor Coalition	A major concern for the Southwest Corridor Transportation Coalition is the reduction in the amount of funding for Regional and Community Improvement Priorities (RCIPs). The previous MnSHIP plan allocated \$570 million or 3.8% of total funds to this category. The new plan allocates just \$310 million or 1.5% over the next 20 years. The strong support for programs like TED and Corridors of Commerce demonstrates that important projects that involve the business community as well as local partners can be completed with these funds. The coalition strongly urges a greater allocation of resources in this area to not only allow for needed highway projects but to leverage outside dollars and build more political support for highway funding overall.
Robert J. Lindall, Southwest Corridor Coalition	While our members recognize the need for additional resources, we would urge more investment of projected revenue to RCIPs and mobility needs

Response

MnSHIP's focus on maintaining the existing state highway system to a state of good repair limits the amount of money available for priority projects of our local transportation partners throughout the state. The previous MnSHIP (2014-2033) stated that investment in RCIPs would continue in the first ten years but would end after 2023. This MnSHIP update (2018-2037) extends investment in RCIPs past 2023 to reflect that the TED program will continue. In addition, MnSHIP includes investment in freight improvements including freight mobility improvements through the National Highway Freight Program which totals \$610 million and 2.9% of investment. Combining the investment in RCIPs and Freight total more than \$900 million over the next 20 years. RCIP is an important investment strategy to help MnDOT coordinate with locals on projects and help bring outside dollars to a project that a community really wants. MnDOT's focus on maintaining the existing system with limited capital dollars limits the amount of money MnDOT can use to work with local partners on projects.

During the course of our outreach efforts, public engagement events, and internal discussions, it was clear that the preferred priority was to maintain the existing system and prioritize preservation efforts first. This came at the expense of investment in other categories such as mobility and RCIPs. MnDOT will work to ensure that investments in RCIPs and mobility improvements are done to maximize the benefits to the public and local partners.

DOCUMENT EDITS

No changes made.

Comment

CORRIDORS OF COMMERCE

Name/ Organization	Comment
Hennepin County	Page 27: With MnDOT quickly approaching the debt repayment limit of 20% of state revenue, how soon will the Corridors of Commerce program be discontinued?

Response

MnDOT has long promoted asset management in planning and prioritizing projects. MnSHIP supports the guiding principles of the Minnesota GO 50-year Vision, including building to a maintainable scale. The investment direction in MnSHIP prioritizes maintaining the existing system which is consistent with public and stakeholder input.

DOCUMENT EDITS

No changes made.

PROJECT DELIVERY

Comment

QUESTION ON PROJECT DELIVERY

Name/ Organization	Comment
Lyndon Robjent	Project Delivery is a significant part of the plan. What percentage goes to each area of project delivery? Does this include the cost to transfer risk from MnDOT to the private sector to take on certain projects? If so, this should be explained given the amount of funding required to do this.

Response

Project delivery includes the costs for right-of-way, consultant services, construction incentives and supplemental agreements. One quarter of the project delivery category is spent on right-of-way, one quarter on consultant services, and half on construction incentives/supplemental agreements. Typically, the project delivery costs included in MnSHIP are not used for MnDOT staff. MnDOT contracts out all highway construction projects to private construction firms.

DOCUMENT EDITS

No changes made.

Comment

CONVEYING PROJECT DELIVER AS COST RATHER THAN AN INVESTMENT

Name/ Organization	Comment
Kris Riesenberg, Federal Highway Administration	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.

Response

Project delivery and small programs investments have been broken out to demonstrate that these investments are made differently than a pavement or bridge investment. Project Delivery investments may be used years before a project is actually completed. For example, right-of-way purchases may be made years before a project is constructed due to an opportunity arising to secure that right of way.

Small Programs consist of programs MnDOT has committed funding to which do not easily fall into another investment category. Also, the way these investments are implemented is different than other MnDOT projects. Small Programs funding is removed before funding is allocated to state highway projects.

The other category is not a true objective area, but rather a place to put investment categories that do not fit well into the other four objective areas. Language has been adjusted in descriptions of Other Investments to make clear that Other Investments is not an objective. Additionally, language describing Project Delivery and Small Programs has been adjusted to identify how

investments in these categories differ from the other investment categories and how MnDOT completes projects in these investment categories differs from the rest of the investments in MnSHIP.

DOCUMENT EDITS

- Throughout the document, language is being removed and revised to indicate that Other is not an objective area.
- Language added to Chapter 1, 3, & 5 discussing the differences between Project Delivery and Small Programs with the rest of the investment categories.

Comment

EFFICIENT DELIVERY OF PROJECTS

Name/ Organization	Comment
City of Minneapolis	Page 124: With regard to innovation, MnDOT has done a great job in finding creative ways to deliver complicated projects in less time and at less cost. Both the Hastings Bridge and the I-35E bridge projects are good examples of this. The City encourages the state to continue to research and use materials that lengthen the useful life of transportation infrastructure and employ construction methods that not just save time and money but also reduce community impacts.

Response

Thank you for your comment. MnDOT is committed to maximizing the benefits of highway investment given the revenue the department receives. There are many strategies detailed in MnSHIP that describe ways MnDOT is stretching its revenue. One of these strategies is to pursue research and innovation to improve efficiency and minimize impacts to the travelling public.

DOCUMENT EDITS

No changes made.

Comment

QUESTIONS ABOUT PROJECT DELIVERY CALCULATION

Name/ Organization	Comment
Douglas Loon, MN Chamber of Commerce	In reading through this DRAFT, we did note one seeming inconsistency. The document explains that MnDOT has significantly updated its estimate of the funding needed for project delivery. In its previous MnSHIP report, MnDOT estimated that the need for project support and delivery would total approximately 11% of the MnSHIP investment program. The total amount actually provided for project support and delivery in its fiscally constrained 2014-2033 20 year investment plan, however, was much less at roughly 8%.

Response

The first ten years of the investment direction estimated 11% for Project Support/Delivery based off of the historic investment. Eleven percent was used as the estimate for project support in the first ten year. This was due to the fact that the first ten years of investment was similar to recent historic investments which balanced maintaining the system while making investments in strategically expanding the state highway system. The second ten years of the investment direction shifted towards investing

more in maintaining the existing system and cut most funding to improvements that expanded the system. An assumption was made that project support costs for these projects would not need as much. Therefore the second ten years assumed that project support costs would be at 5%. The combination of these two ten year periods averaged to 8%.

DOCUMENT EDITS

No changes made.

Comment

PROJECT DELIVERY RELATED TO BONDING

Name/ Organization	Comment
Douglas Loon, MN Chamber of Commerce	This DRAFT suggests that new analysis has led the department to determine that spending needed to deliver projects was 16% of the capital program, not 8% or even 11%. The DRAFT notes that the primary reason for this change is the fact that MnDOT has delivered a number of legislatively authorized bond programs in recent years, which tend to need additional investment in Project Delivery for right-of way and project design. The DRAFT says MnDOT revised the analysis [of the percentage of funding needed for project delivery] based on this additional information. While it certainly stands to reason that bond programs may require additional project delivery investment, it is unclear why the department would update its expectations of the needed investment in project delivery over the next 20 years when this DRAFT 20 year funding plan does not anticipate any additional bonding over the life of the plan. In its revenue outlook, the DRAFT specifically states, Any potential bonding that comes after the adoption of this plan is not reflected in the investment direction set forth by MnSHIP... We wonder, then, why the department's estimate of its project delivery needs for the next 20 years, when little bonding will be done, would be based upon the experience of the last several years, when much bonding was done. Given the significant amount of additional funding that this MnSHIP update would invest in project delivery (\$3.278 Billion over 20 years vs. \$1.33 Billion over the life of the previous 2014-2033 MnSHIP plan), we believe the seeming inconsistency in the rationale used to justify this investment is worth noting.

Response

The text referenced in this comment, on page 70, refers to the change in Project Delivery made from Approach B to the final investment direction. This change was from 14% to 16% of the total capital program. This change was due to further analysis into MnDOT's capital project delivery costs over the last three years. .. The text on page 70 has been updated to remove the specific reference to bonding. MnDOT will continue work to find any efficiencies in its Project Delivery costs. MnDOT will use any efficiency in Project Delivery to program additional projects to maintain bridge and pavement conditions

DOCUMENT EDITS

- Chapter 4, page 70, paragraph 4
 - Reworded to include previous project delivery percentage and to clarify project delivery analysis. Two sentences on Corridors of Commerce and bonding removed. Another sentence on legislative bonding in the future removed.

Comment

BIDDING PRACTICES

Name/ Organization	Comment
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	Maybe we also need to go back and review bidding practices and how MnDOT scores and lets out projects with some of the recent developments of huge delays and cost overruns on projects like the St. Croix river crossing bridge, Highway 53 relocation and bridge project in northeastern Minnesota and the Winona Highway 43 bridge project.

Response

Comment noted and forwarded to MnDOT District staff. MnSHIP is not a project-specific plan. It details the state highway investments over the next 20-year by investment category. MnDOT Districts are responsible for planning and programming individual highway improvement projects. MnDOT is committed to maximizing the benefits of highway investment given the revenue the department receives through many strategies including innovative project delivery and using flexible design standards.

DOCUMENT EDITS

No changes made.

SMALL PROGRAMS

Comment

Name/Organization	Comment
Hennepin County	Page 102: Why would the Small Programs not be selected and prioritized at the District level instead of central office?

Response

Small programs typically respond to short-term, unforeseen issues or are used to fund one-time specialized programs that do not fit into a MnSHIP investment category. These programs are run centrally for many reasons including the small amount of money available and specialized expertise available at central office. An example of a small program is historic properties which maintains historic properties and infrastructure along the state highway right-of-way.

DOCUMENT EDITS

No changes made.

Other Comments

TRANSIT

Comment

Name/ Organization	Comment
Linda Boorman	There appears to be a lot of government involved here which obviously costs, thus raising transportation costs. I mainly want to see improved mass transit in our cities and between our cities. I live outstate where many people do not think Light Rail, etc., are important, but having lived in large cities without metro/subway, I saw how putting them in later is a real nightmare.

Response

Thank you for your comment. The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision support investment in multiple modes of transportation on the highway system. MnDOT believes that the transportation system must be accessible and safe for users of all abilities and incomes. MnSHIP directs capital investment for Minnesota's state highway system over the next twenty years. It does not cover transit investment in Minnesota.

DOCUMENT EDITS

No changes made.

TRANSPORTATION FUNDING

Comments

SUPPORT FOR NEW TRANSPORTATION FUNDING

Name/ Organization	Comment
Brad Aho, I-494 Corridor Commission	Thank you for the opportunity to provide comments on the Minnesota Department of Transportation's Draft 20-Year State Highway Investment Plan (MnSHIP) on behalf of the I-494 Corridor Commission. The I-494 Corridor Commission is made up of elected officials and city staff from Bloomington, Eden Prairie, Edina, Minnetonka, and Richfield. The Commission has been a leader in helping commuters find more efficient means of getting to work and school, and encouraging economic growth and regional prosperity through improved transportation options along I-494. The I-494 Corridor Commission has advocated that the Legislature pass a comprehensive transportation funding package that addresses the long-term needs of our state and provides for improvements to our roads, bridges, tunnels and transit system.

Name/ Organization	Comment
Brad Aho, I-494 Corridor Commission	The Commission appreciates MnDOT's acknowledgement of the importance of improving mobility and reliability. These investments are mentioned under the Priorities for Additional Funding section of the MnSHIP report. We are hopeful that next session the Legislature will pass a comprehensive transportation bill that will allow MnDOT to address more of the critical transportation needs facing our state.
Dan Rockwell	Without question Minnesota needs to find additional funds for transportation projects/maintenance. If possible I'd request/lobby the MN legislature separate funding proposals for Roads and Bridges from funding plans for Mass Transit. In my opinion this would increase the probability of gaining traction on your main funding deficit items.
Nancy Schouweiler, Dakota County	Both the challenges faced by our transportation system, and the need for significant, comprehensive increases in transportation funding are at a point of unprecedented significance to the well-being of our state. This statement holds true from perspectives of economic competitiveness, health and safety, and the general quality of life for our citizens. With the substantial unmet transportation needs across the state, including those in Dakota County, it is absolutely critical that: Mn/DOT be proactive and comprehensive in its approach to pursue a major transportation funding initiative with the legislature in 2017. MnDOT also needs to ensure it retains the ability to direct any new transportation revenues to the most pressing needs on the Trunk Highway system. Continued education of the public and elected officials on transportation needs and funding options will be critical to this end. On behalf of the Dakota County Board of Commissioners, I pledge our assistance in efforts to pursue increases in highway and bridge funding during the coming legislative session.
Douglas Loon, MN Chamber of Commerce	We are also acutely aware of the need for additional investment into our state's transportation system. Our work in 2006 to support the constitutional dedication of the state's motor vehicle sales taxes to transportation uses, our role in helping to pass the 2008 funding bill, and our efforts over the past two legislative sessions to secure the passage of a long-term, comprehensive transportation funding bill make clear our commitment to increased funding for the state's transportation infrastructure. In all of these efforts, we and other stakeholders have looked to MnDOT to help us articulate the why, what, and how of the state's long-term transportation funding needs. In its update of MnSHIP for 2018, MnDOT has taken steps to inform that conversation further. Its inclusion of four additional investment categories in this MnSHIP update,(Facilities, Freight, Jurisdictional Transfer, and Small Programs) provides Minnesotans,with even greater detail about the long-term needs of our highway system.
Liz Workman, I-35W Solutions Alliance	The Alliance will continue to advocate a comprehensive transportation finance package with additional funding for critical needs on the transportation system and reduce the gap identified in the draft plan, and we look forward to partnering with MnDOT to make this case to the legislature.
City of Minneapolis	Page 28: The graph and text very effectively shows that as time progresses user fees and other projected revenues combined with inflation will not keep up with infrastructure needs. The City supports legislative efforts that will create long-term sustainable transportation funding. As mentioned on pages

Name/ Organization	Comment
	124-125 there are several ways to stretch existing dollars, however improvements in technology, process efficiencies, and strategic investments will only go so far.

Response

The state highway system is aging and requires increased capital investment and additional maintenance in the years ahead. MnDOT estimates it will have approximately \$21 billion to invest in state highways over the next 20 years, compared to approximately \$39 billion in estimated needs. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years under the current funding scenario. The funding gap in MnSHIP will result in significant unmet needs which will affect system conditions and increasingly the experience for the travelling public.

DOCUMENT EDITS

No changes made.

Comment

PUBLIC PRIVATE PARTNERSHIP

Name/ Organization	Comment
Kris Riesenber, Federal Highway Administration	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.

Response

MnDOT is committed to maximizing the benefits of highway investment given the revenue the department receives. There are many strategies detailed in MnSHIP that describe ways MnDOT is stretching its revenue. In Chapter 7 of the plan, MnDOT describes the internal and external strategies that the department is pursuing to stretch available revenue. MnDOT is open to pursuing public-private partnerships and is continuing to explore it as a strategy on projects. However, MnSHIP does not typically discuss or analyze new revenue options.

DOCUMENT EDITS

No changes made.

Comment

QUESTIONING INVESTMENT NEED

Name/ Organization	Comment
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	The separation between requests for future project delivery funding related to bonding projects and MnDOTs own expectations of future bond funds presents another puzzling matter. The Legislature attempted to provide funding to complete a group of major, long-awaited capacity improvements in the bonding bill which passed the House. But MnDOT, advising the Governor, sank special session negotiations over fears of lack of readiness for the projects, despite many of them having received MnDOT funds in the past through Corridors of Commerce, CIMS, or elsewhere.
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	Finally, the Legislative Auditor said MnDOT has been ill-prepared to handle influxes of funds through bonding or 'unanticipated' sources, despite them coming from the Legislature for years. To me, it appears MnDOT is working not to address the significant needs of the transportation system in order to fit a predefined agenda.

Response

MnSHIP is a fiscally constrained plan and does not identify projects to fund with additional revenue. MnDOT asked stakeholders their priorities for additional revenue. Chapter 6 of the plan describes these priorities. These identified priorities will help MnDOT to identify projects to pursue with additional revenue. In addition, the Work Plan in Chapter 7 includes a task to establish criteria for prioritization of expansions projects with additional funding. MnDOT is making a concerted effort to prioritize projects based on plan objectives and is preparing projects through preliminary engineering should additional revenue be made available.

Comment

Name/Organization	Comment
Timothy J. Kelly, Minnesota House Transportation Policy and Finance Committee	MnDOT needs to minimize its political agenda and get back to the priority of fixing and maintaining roads and adding new capacity as the system requires it and use reasonable methods to estimate long term costs and reasonable processes for selecting future projects.

Response

The 20-year investment direction established in MnSHIP focuses on maintaining the existing state highway system while making limited mobility investments. Approximately 70 percent of the investment in MnSHIP is for maintaining the existing system.

DOCUMENT EDITS

No changes made.

Comments

INVESTMENT NEED GAP

Name/ Organization	Comment
Brad Aho, I-494 Corridor Commission	The Draft MnSHIP report released last month reflects MnDOT's daunting task of prioritizing Minnesota's urgent transportation needs in the face of a projected \$18 million funding gap over the next 20 years.
Steve Hosch	The cost to maintain and update roads is growing at a substantial rate, money needs to be provided to ensure that these roads are safe for the people who travel them on a daily basis.

Response

The state highway system is aging and requires increased capital investment and additional maintenance in the years ahead. MnDOT estimates it will have approximately \$21 billion to invest in state highways over the next 20 years, compared to approximately \$39 billion in estimated needs. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years under the current funding scenario. The funding gap in MnSHIP will result in significant unmet needs which will affect system conditions and increasingly the experience for the travelling public.

DOCUMENT EDITS

No changes made.

Comment

TRANSPORTATION FUNDING FOR ONLY ROADS AND BRIDGES

Name/ Organization	Comment
John Fischer	I would support another 5 cent increase in gas tax used strictly for roads and bridges. Nothing for hiking and biking trails. Fund that with user fees like \$200 per person. I'm tired of paying for anything but motorist friendly infrastructure.
John Fischer	I don't mind increasing the gas tax as long as it is used for motorist related infrastructure. I am REALLY TIRED OF paying for bus riders and bike riders and train riders, no matter what. !!!
Joe Scott	It's pretty simple folks - no new roads, all funding for car infrastructure from user fees, and quit ruining streets in the city with your highway designations.

Response

The primary state funding sources for MnSHIP are the motor fuel excise tax (gas tax), vehicle registration fee (tab fees) and motor vehicle sales tax. Minnesota gas tax revenue is primarily used for roads. The investment direction in MnSHIP focuses on maintaining the existing state highway system while making limited mobility investments. Very little expansion is expected on

Minnesota state highways over the next 20 years given the MnSHIP investment direction. Pedestrian and bicycle trails off the state highway system are not eligible for state road construction investments. The plan does include improvements to bicycle and pedestrian infrastructure on or along state highways. Transit projects are not eligible for state road construction investments.

DOCUMENT EDITS

No changes made.

Comment

COST OF WEAR AND TEAR BY USER

Name/ Organization	Comment
Patricia McLoone	So many of the road considerations are for big trucks that do way more damage to the road than my little car does, and I think there should be a concerted effort to evaluate the actual road wear by vehicle weight, size, miles etc. as an insight into how we can fairly pay for our roads and their upkeep. The only studies I have been able to find are older and they suggest that the damage and wear to roads and the environment from trucks vs small cars is a huge multiple and the costs are not in any way adequately covered by registration fees or gas taxes. I do not know if this is still accurate and to what degree. So, all projects should take into account the users of these projects and the true cost of the wear and damage to these projects by types of users.

Response

Thank you for your comment. MnSHIP is not a project-specific plan and thus does not evaluate costs and benefits for specific projects. Vehicle weight is a significant factor in bridge and pavement deterioration. MnSHIP prioritizes maintenance of the National Highway System which has the highest volumes of cars and trucks. These roads typically receive more extensive fixes due to their higher volumes of traffic. trucks also pay more per mile in fuel taxes than cars and light duty SUVs and pickups.

DOCUMENT EDITS

No changes made.

TRANSPORTATION TRENDS

Comment

TRAVELER SAFETY TRENDS

Name/ Organization	Comment
City of Minneapolis	Page 41: The plan does a great job of highlighting the Toward Zero Death program and appropriately recommends substantial resources to this initiative. With regard to trends, it should be noted in the plan that motorcycle deaths make up a large percentage of fatalities throughout the state. There is also a disproportionately high number of pedestrian and bicycle injuries and fatalities, especially in urban areas

Name/ Organization	Comment
	(when compared to mode share). The plan should call out both statistics and should call out the need to identify resources to help reduce crashes for these modes.

Response

Thank you for comment. Over the past decade, MnDOT and other transportation stakeholders have made great strides to reduce traffic fatalities. However, fatalities for motorcyclists, bicyclists, and pedestrian have not seen the same reduction.

DOCUMENT EDITS

- Chapter 2, page 41
 - Added a sentence to highlight that motorcycle fatalities and bicycle and pedestrian fatalities have not followed the same trajectory as total traffic fatalities.

Comment

CLIMATE CHANGE

Name/ Organization	Comment
Edward Ehlinger, Minnesota Dept. of Health	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.

Response

While MnSHIP does not specifically address climate change, it does recognize climate events and the negative impact they have on the state transportation system. MnDOT identified climate change as a high investment risk currently and over the next 20 years given the investment direction in MnSHIP. Investment to proactively address potential flooding vulnerability due to increased large precipitation events was discussed as a part of RCIP. However, no investment is identified to proactively address potential vulnerabilities to flooding. The Statewide Multimodal Transportation Plan includes two work plan items intended to address climate change and environmental quality issues. These work plan items are located in Chapter 6 of the plan.

DOCUMENT EDITS

No changes made.

Comment

EQUITY

Name	Comment
Edward Ehlinger, Minnesota Dept. of Health	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.

Response

MnSHIP supports the vision for an integrated multimodal transportation system established in The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision. MnDOT believes that the transportation system must be accessible and safe for users of all abilities and incomes. MnSHIP identifies Minnesota's aging population as an important trend influencing transportation. The STMP identifies work plan items related to equity for implementation over the next few years. As MnSHIP is implemented and selection of projects occurs, MnDOT will look to any strategies coming from the SMTP work plan to address equity.

DOCUMENT EDITS

No change made.

Comment

POPULATION GROWTH

Name	Comment
Robert J. Lindall, Southwest Corridor Coalition	According to information in the Thrive 2040 projections, the bulk of future growth in population, households and employment will occur in the outer suburbs. Carver County is projected to experience a population growth from 91,042 people in 2010 to 151,720 people in 2040 with a corresponding increase in households from 32,891 in 2010 to 60,550 in 2040. The additional 60,678 residents are expected to generate an additional 212,373 trips per day in the region. We need to plan now for highway and transit expansion that will maintain mobility, safety and a high quality of life in this part of the metro area.

Response

MnSHIP is a fiscally constrained plan and therefore cannot accommodate all needs and projects on the state highway system. During the MnSHIP update process, MnDOT identified a need of \$39 billion with revenue of \$21 billion over the next twenty years. The result is an unmet need of \$18 billion. This unmet need shows that many projects on the state highway system will not get funded over the next twenty years. The investment direction in MnSHIP prioritizes maintaining the existing system which is consistent with public and stakeholder input. The investment in Twin Cities Mobility in the last MnSHIP ended in 2023. This plan continues that investment through 2023 but does not add more investment in Twin Cities Mobility. Investment will continue to support economic development through the Transportation Economic Development program identified in RCIP.

DOCUMENT EDITS

No changes made.

DOCUMENT EDITS

No changes made.

COMPLETE STREETS

Comment

Name/ Organization	Comment
Edward Ehlinger, Minnesota Dept. of Health	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.

Response

MnSHIP supports the vision for an integrated multimodal transportation system established in The Statewide Multimodal Transportation Plan and the Minnesota GO 50-Year Vision. MnDOT believes that the transportation system must be accessible and safe for users of all abilities and incomes. The Statewide Multimodal Transportation Plan contains a strategy to "use a complete streets approach to assess trade-offs to better serve both users and those affected by the transportation system." The SMTP is a plan for all transportation agencies and encourages partner agencies to formally adopt a complete streets approach.

DOCUMENT EDITS

No changes made.

COORDINATION WITH TRANSPORTATION PARTNERS

Comments

Name/ Organization	Comment
Nancy Schouweiler, Dakota County	"It is absolutely critical that,..." Mn/DOT be flexible in working with local agencies in developing projects that meet multiple objectives. For example, working with local agencies on project scope early in the process of developing preservation projects could result in projects that address safety and mobility issues in addition to preservation issues, resulting in better value for MnDOT investment.

Name/ Organization	Comment
City of Minneapolis	<p>Page 83: With regard to bidding strategies it should be noted that more early coordination is needed between local agencies and the state with regard to construction staging and roadway closures. Sometimes a staging method that creates cost savings for a state project may have additional costs for local agencies or may negatively impact local businesses and/or neighborhood livability. Similarly, early communication between the state and local agencies is needed so that state and local projects don't create mobility and traffic problems when there are multiple construction projects or events that require street closures in a given area.</p>
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 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 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>

Name/ Organization	Comment
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>
Washington County	<p>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.</p>

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

Response

Comment is noted. MnDOT works to maximize local benefits and meet multiple objectives on projects through investments in RCIPs, such as cooperative agreements, and also early project coordination with our transportation partners through our 10-year Capital Highway Investment Plan.

DOCUMENTS EDITS

No changes made.

AIR TRAFFIC

Comment

Name/ Organization	Comment
Angelika Erhard	How do you plan to provide relief from the constant air traffic from MSP over southwest Minneapolis? It is absolute torment-hour after hour and day after day that no one is willing to acknowledge. In addition to the constant outrageous and unhealthy and stressful noise, there is also additional air particle pollution that is not being investigated and shared with the public!

Response

MnSHIP directs capital investment for Minnesota's state highway system over the next twenty years. The plan does not cover aviation issues. Minneapolis-St. Paul International Airport is run by the Metropolitan Airports Commission. MnDOT's Statewide Multimodal Transportation Plan contains multiple strategies that address the impact of transportation on natural resources and the surrounding environment.

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 Health
- Minnesota Department of Agriculture
- Manitoba Infrastructure
- I-35 W Solutions Alliance
- I-494 Corridor Coalition
- I-94 West Corridor Coalition
- The Transportation Alliance
- Dakota County
- Met Council Transportation Committee
- Minnesota Chamber of Commerce
- Representative Tim Kelly, Chairman, Minnesota House Transportation Policy and Finance Committee
- Representative Tom Emmer, Minnesota's Sixth Congressional District
- City of Minneapolis
- Washington County
- Southwest Corridor Transportation Coalition



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



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
St. Paul, MN 55164-0975
www.health.state.mn.us

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.

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

Manitoba



Infrastructure

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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



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[Minneapolis](#) [Richfield](#) [Savage](#) [Scott County](#)

October 14, 2016

Commissioner Charlie Zelle
Minnesota Department of Transportation
John Ireland Blvd
St. Paul, MN 55155

Dear Commissioner Zelle,

Thank you for the opportunity to provide comments on the Minnesota Department of Transportation's Draft 20-Year State Highway Investment Plan (MnSHIP) on behalf of the 35W Solutions Alliance. We urge you to consider our suggestions and look forward to working with you to reduce the funding gap, well documented in the new plan.

While we appreciate MnDOT's analysis on the funding gap due to construction inflation and more fuel efficient vehicles, it only focuses on the trunk highway construction budget. We suggest the plan state the potential operations and maintenance shortfall.

The I-35W Solutions Alliance supports funding, building, operating and maintaining a robust multimodal transportation system along the 35W corridor between Elko New Market and downtown Minneapolis that reduces congestion, improves safety, and enables economic competitiveness. We have and will advocate that the Legislature pass a comprehensive transportation funding package addressing the critical needs of our state and provide for improvements to our roads, bridges, interchanges and transit system.

Overall our members are disappointed by the lack of resources directed to congestion and mobility needs in the Twin Cities. 35W is the state's most heavily traveled corridor, yet funds are still lacking for the Alliance's highest priorities. The state's share of funds for the Orange Line Station at Lake Street and 35W/Lake Street Access Project, including the bridgework and entrance and exit ramps, are urgently needed. The reconstruction of the I-494/I-35W interchange would consume more than the entire amount allocated in the next 20 years for Twin Cities Mobility in the draft MnSHIP. This interchange, constructed in the 1950s, is our state's busiest and is ranked the 17th worst commute in the U.S. by the Federal Highway Administration.

The Alliance would like the investment increased for Twin Cities Mobility in the new MnSHIP. The draft report identifies a \$18 billion funding gap over the next 20 years and has significantly less funding to meet mobility needs. The last plan had a goal of \$520 million for Twin Cities Mobility (3.5%), but this draft only has \$240 million (1.1%), compared to a need of \$4.58 billion in investment over the same time period and to \$520 million over 20 years for Twin Cities Mobility (2.8% of total investments) in the last MnSHIP.

The Alliance will continue to advocate a comprehensive transportation finance package with additional funding for critical needs on the transportation system and reduce the gap identified in the draft plan, and we look forward to partnering with MnDOT to make this case to the legislature.

Sincerely,

A handwritten signature in black ink, appearing to read "Liz Workman". The signature is written in a cursive, flowing style.

Liz Workman
Chair, I-35W Solutions Alliance



I-494 CORRIDOR COMMISSION

Reducing Traffic Congestion

Bloomington • Eden Prairie • Edina • Minnetonka • Richfield

Eden Prairie Councilmember Brad Aho
Chair, I-494 Corridor Commission
5701 Normandale Road, Suite 322
Edina, MN 55424

September 14, 2016

Commissioner Charlie Zelle
Minnesota Department of Transportation
395 John Ireland Blvd
St. Paul, MN 55155-1899

Dear Commissioner Zelle,

Thank you for the opportunity to provide comments on the Minnesota Department of Transportation's Draft 20-Year State Highway Investment Plan (MnSHIP) on behalf of the I-494 Corridor Commission.

The I-494 Corridor Commission is made up of elected officials and city staff from Bloomington, Eden Prairie, Edina, Minnetonka, and Richfield. The Commission has been a leader in helping commuters find more efficient means of getting to work and school, and encouraging economic growth and regional prosperity through improved transportation options along I-494. The I-494 Corridor Commission has advocated that the Legislature pass a comprehensive transportation funding package that addresses the long-term needs of our state and provides for improvements to our roads, bridges, tunnels and transit system.

Reconstruction of the I-494/I-35W Interchange is the Commission's highest priority; the cloverleaf interchange is the busiest in Minnesota and has been ranked 17th worst commute in the entire nation.

The Draft MnSHIP report released last month reflects MnDOT's daunting task of prioritizing Minnesota's urgent transportation needs in the face of a projected \$18 million funding gap over the next 20 years. The current MnSHIP draft includes \$240 million over the next 20 years for Twin Cities Mobility, or 1.1% of total investment. This is compared to a calculated need of \$4.58 billion in investment over the same time period and to \$520 million over 20 years for Twin Cities Mobility (2.8% of total investments) in the previous MnSHIP that covered 2014-2033. The I-494 Corridor Commission strongly supports investments in Twin Cities Mobility and would like the investment increased. Investments in the category of Twin Cities Mobility reduce congestion, increase reliability, and provide high rates of return in the form of economic

development. In addition to the I-494/I-35W interchange, the Commission supports other projects that largely fall into MnDOT's category of Twin Cities Mobility which we believe should be made into a priority funding category:

- Highway 169/Valley View Road Interchange reconstruction.
- Addition of a westbound auxiliary lane to the 494 corridor between TH 77 and 35W.
- Addition of an eastbound auxiliary lane on I-494 between France Ave. and I-35W
- Reconstruction of the France Avenue/TH62 Interchange.
- Construction of the 77th Street underpass beneath TH 77 to connect to 24th Avenue.
- Addition of lanes on TH 62 in each direction from TH 77 to Portland & Penn to TH 169.
- Reconstruction of the Tracy & TH 62 Interchange and the Gleason & TH 62 Interchange.

The Commission appreciates MnDOT's acknowledgement of the importance of improving mobility and reliability. These investments are mentioned under the Priorities for Additional Funding section of the MnSHIP report. We are hopeful that next session the Legislature will pass a comprehensive transportation bill that will allow MnDOT to address more of the critical transportation needs facing our state.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Aho". The signature is fluid and cursive, with the first name "Brad" being larger and more prominent than the last name "Aho".

Brad Aho
Chair, I-494 Corridor Commission



Transportation Commissioner
Minnesota Department of Transportation
Transportation Building
395 John Ireland Blvd. MS 100
St. Paul, MN 55155

Commissioner Zelle,

The I-94 Corridor Coalition is committed to a comprehensive transportation package with sustainable new funding sources that delivers projects efficiently, cost effectively and transparently. The Coalition and its members strongly recommend the I-94 capacity expansion project from St. Michael to Albertville be not only mentioned, but funded, in the 20 year MnSHIP plan.

I-94 is already a significant source of congestion and is the heaviest traveled corridor in Minnesota. The congestion however, will only worsen as Central Minnesota experiences state-leading population growth. The only way to improve commerce, safety issues, and traffic delays on I-94 is through capacity expansion. The commuters and businesses that rely on I-94 for travel and commerce are desperate for a solution to the current problems.

The economic return along this corridor is second to none. Since the completion of Phase 1 capacity expansion in 2015, the corridor has seen an astonishing 55% reduction in total vehicle delay, as well as nearly three million square feet of industrial development. The I-94 West Corridor has been the #1 Interregional Corridor in the State of Minnesota for return on investment criteria calculation. Phase II of the expansion project was awarded \$1.4 million for preliminary design in late 2014 and is likely one of the most 'shovel ready' projects in the que.

Investment in this expansion meets and surpasses multiple MnDOT criteria and would be of great economic benefit to all of Minnesota. Given the merits of the I-94 project, we strongly support and encourage MnDOT to include funding for the I-94 West Corridor expansion capacity project in the 20 year MnSHIP plan.

Sincerely,

Steve Bot
Chair, Board of Directors
I-94 West Corridor Coalition



October 14, 2016

Commissioner Charlie Zelle
Minnesota Department of Transportation
Mail Stop 100
395 John Ireland Blvd
St. Paul, MN 55155

Dear Commissioner Zelle:

On behalf of the member organizations of the Minnesota Transportation Alliance, I would like to submit these comments on the new draft Minnesota State Highway Investment Plan for your consideration. We urge you to consider and incorporate our suggestions in the final plan and look forward to working with you to address the lack of funding that has been so clearly documented in this new plan.

We appreciate the clear analysis regarding the growing funding gap with the explanation of why construction inflation along with more fuel efficient vehicles means that the gap is growing between needs and available funding with current funding levels.

The Minnesota State Highway Investment Plan is an important tool for the public and policymakers; however, the Department needs to make clear what this plan is and what it is not. We would suggest an explanation of the overall plan that makes clear that this is not a comprehensive analysis of total road and bridge needs in Minnesota since it deals only with the state trunk highway system. The plan should clarify in the executive summary the number of miles on the state system versus the local system and provide an estimate of the funding gap on the local system to provide some context. In addition, with the local cost participation policy regarding state highway projects, what is the local cost of the identified funding gap? Given that jurisdictional transfers have been added as a category of funding, there should be more explanation of the local system and the fact that transfers don't remove the cost of maintaining all roads and bridges in Minnesota.

We also would suggest making it clear that this plan deals only with the state construction budget, not the operations and maintenance budget and there may be a shortfall in that area as well. The public and policymakers need to understand the full picture.

While Alliance members recognize the challenge of maintaining the existing transportation system, and we appreciate the Department's efforts to balance other needs, with an additional \$3 billion over the previous MnSHIP plan in projected revenue, our members would like to see more resources directed to safety, congestion and mobility needs. Particularly when it comes to the use of any additional revenue that may be provided with legislative action to increase taxes and fees; we would urge more balance among the many unmet needs.

Since 1893

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We agree that pavement and bridge maintenance should be the top priority and should receive the majority of the state construction dollars. We understand the value of timely maintenance. With additional revenue in the system, we believe other important needs should be given more priority. According to analysis done by TRIP in June, 2016 with pavement data from US DOT for all 50 states, Minnesota is pretty close to the national average for pavement conditions and below the national average for deficient bridges. This suggests that our pavement conditions are not out of line with other states and we are not facing the serious deterioration that some other states including Wisconsin are facing.

Alliance members appreciate the increase in funding for project delivery which recognizes that a larger program requires a larger share of funding to deliver that program. We also support the inclusion of funding to meet freight needs and to match potential new federal funding that could be provided through the FAST Act.

Compared to the previous MnSHIP plan, the investment direction in this plan has significantly less funding to meet mobility needs and regional and community improvement priorities. The last plan identified \$520 million for Twin Cities Mobility, representing 3.5% of total funding. This plan provides only \$240 million for Twin Cities Mobility and \$25 million for Greater Minnesota Mobility (formerly IRC) which represents just 1.2% of total funding available. With growth in the state population and continued economic growth, we have concerns about the extremely low level of investment in these areas leaving unfinished highway corridors with remaining two-lane segments.

Congestion reports for the Twin Cities Metropolitan Area show continued growth in the amount of delay and the number of miles of congested freeway. Although the number of vehicle miles travelled decreased during the recession in 2009 and 2010, VMT is back up and growing. The Federal Highway Administration projects continued growth in VMT over the next 20 years. There seems to be little discussion in the draft Minnesota Highway Investment Plan of the need to meet federal performance measures that are being developed to improve travel time reliability and reduce delays. New targets will require tracking of travel time reliability and peak hour travel times. With only \$240 million invested over 20 years in the metro district, it's difficult to see how Minnesota will make progress in improving travel time reliability.

With fatalities increasing in Minnesota as VMT increases, we continue to see fatalities occurring mainly on two-lane rural highways. In 2015, there were 74,772 traffic crashes with 411 deaths and 29,981 injuries which is the highest level since 2010. We believe that more needs to be invested in addressing safety problems. As the plan notes, only a limited number of locations with a sustained crash history will be addressed. Changes in the FAST Act should make funding for infrastructure investments a higher priority in addressing the need to improve safety. While other categories of investments may help improve safety, it's an area that needs to be a top priority. The safety benefits of other investments including mobility investments could be highlighted in the report.

The new category of Small Programs raises some questions. It is not very clear how the \$630 million for this category - which is higher percentage than the funding for mobility or RCIPs and is only slightly less than the amount for safety -- will be spent. The plan states only that: "Small Programs is used to fund short-term, unforeseen issues and one-time priorities needs as they arise. Some programs do not easily fit into a MnSHIP investment category. If funding is required beyond the short-term, an effort is made to incorporate the program into a MnSHIP investment category during the next MnSHIP update. Components of Small Programs in MnSHIP include centrally managed programs and historic property investments."

With greater concern over transparency and accountability expressed by the legislature and the business community when it comes to highway spending, more information should be provided on exactly how 3% of total funding available over the next 20 years will be spent.

Alliance members are committed to advocating for additional long-term funding for highway investments to reduce the gap between projected funding and the level of funding needed to adequately address safety and mobility needs. In order to convince the public and lawmakers that additional tax revenue will be spent wisely, we know that clear information about how additional funds will be spent and what the benefits will be is needed. The more specific MnDOT can be about the use of increased revenue, the more support there will be as evidenced by polls both in Minnesota and around the country as well as by the experience of counties that have passed local option sales taxes with a list of projects that will be completed with those funds.

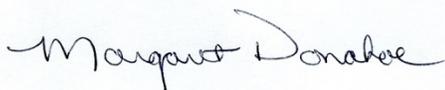
While the Department's priorities for spending any additional revenue over and above anticipated funding levels continues the emphasis on maintaining the existing system, we have concerns that political support will be difficult to achieve for maintenance purposes. Legislative history suggests that increasing taxes to maintain pavement has not motivated lawmakers to take action which is exactly why the state faces such a huge and growing shortfall. Attempts to increase funding for highways during the 2016 Legislative Session demonstrated the legislature's interest in specific programs like Corridors of Commerce and specific projects as evidenced by the over \$2 billion worth of funding for specific projects introduced in bills by legislators during the 2015-16 biennium. The draft MnSHIP calls for additional revenue to be spent:

- Maintaining and repairing existing assets on the state highway system
- Strategically improving mobility and reliability at high priority locations on the NHS
- Reconstructing Main Streets

The ability to secure any additional revenue may require a commitment that the Department be willing to consider other under-funded priorities. Without more flexibility, legislators will be more likely to earmark funds for particular projects. Without additional revenue, maintenance needs will continue to fall further behind.

Again, we appreciate the opportunity to comment on the Draft Minnesota State Highway Investment Plan for 2018-2037. The members of the Minnesota Transportation Alliance are committed to working with MnDOT to make the case for additional funding to address critical needs on the transportation system and we appreciate the analysis that the Department has put together to help explain to the public and policymakers how critical these investments are and how urgently needed additional dedicated funding is for the future of the state's economy and quality of life.

Sincerely,



Margaret Donahoe
Executive Director

FHWA Forecasts of Vehicle Miles Traveled (VMT): Spring 2016

Office of Highway Policy Information

Federal Highway Administration

May 2, 2016

Table 1. Projected Growth in Vehicle Miles Traveled (VMT): Spring 2016

Vehicle Class	Compound Annual Growth Rates					
	Low Economic Growth Outlook*		Baseline Economic Growth Outlook*		High Economic Growth Outlook*	
	2014 - 2034 (20 Year)	2014 - 2044 (30 Year)	2014 - 2034 (20 Year)	2014 - 2044 (30 Year)	2014 - 2034 (20 Year)	2014 - 2044 (30 Year)
<i>Light-Duty Vehicles</i>	0.69%	0.44%	0.81%	0.47%	0.80%	0.46%
<i>Single-Unit Trucks</i>	1.31%	1.05%	1.73%	1.50%	2.00%	1.72%
<i>Combination Trucks</i>	1.59%	1.44%	2.08%	1.87%	2.48%	2.24%
Total	0.76%	0.53%	0.92%	0.61%	0.96%	0.65%

*See the following sections for detailed descriptions of the Baseline and alternative economic outlooks.

AM Plus PM Miles of Directional Congestion

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Severe	64	82	51	55	82	73	85	99	76	115
Moderate	97	112	104	107	127	125	128	90	118	120
Low	107	111	108	114	117	121	113	114	127	120
Total	267	305	263	276	326	319	325	302	321	354

AM Plus PM Percent of Miles of Directional Congestion

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Severe	4.9%	6.3%	3.4%	3.6%	5.4%	4.8%	5.6%	6.5%	5.0%	7.6%
Moderate	7.5%	8.6%	6.8%	7.1%	8.3%	8.2%	8.4%	5.9%	7.8%	7.9%
Low	8.2%	8.6%	7.1%	7.5%	7.7%	7.9%	7.5%	7.5%	8.4%	7.9%
Total	18.3%	20.9%	17.3%	18.2%	21.5%	21.0%	21.4%	19.9%	21.1%	23.4%

Interstate Highway System Report Appendix - June 2016



State	Interstate Pavement in Poor Condition	Interstate Pavement in Med/Good Condition	Interstate Pavement in Fair Condition	Interstate Pavement in Good Condition	Interstate Bridges Structurally Deficient	Interstate Bridges Functionally Obsolete	2014 Fatality Rate Per 100 MIL VMT Interstates	2014 Fatality Rate Per 100 MIL VMT Non-Interstates	2014 Estimate of Lives Saved By Interstates	Percent Increase in Interstate Travel 2006-2014	Daily Traffic Per Urban Interstate Lane Mile	Percent Urban Interstates Congested	Percent Rural Interstate Travel Combination Trucks	Percent Total Interstate Travel Combination Trucks
Alabama	3%	8%	8%	81%	2%	17%	0.72	1.40	97	19%	10,573	25%	18%	12%
Alaska	10%	21%	18%	52%	10%	5%	1.43	1.54	2	10%	11,264	0%	7%	5%
Arizona	2%	6%	8%	85%	3%	9%	0.29	1.35	73	10%	11,896	30%	20%	12%
Arkansas	5%	11%	12%	72%	3%	12%	0.68	1.61	82	19%	10,040	21%	32%	23%
California	11%	19%	15%	55%	4%	15%	0.52	1.07	481	10%	19,424	85%	17%	7%
Colorado	6%	16%	19%	59%	6%	19%	0.59	1.14	71	33%	14,446	51%	13%	8%
Connecticut	4%	11%	14%	72%	7%	19%	0.41	0.98	59	3%	15,391	60%	8%	7%
Delaware	10%	14%	22%	54%	1%	21%	0.00	1.45	18	-10%	13,449	63%	N/A	6%
Dist. of Columbia	33%	63%	2%	2%	1%	46%	0.70	0.65	-	-7%	15,796	85%	N/A	1%
Florida	1%	3%	5%	91%	0%	9%	0.59	1.39	292	21%	15,088	59%	14%	8%
Georgia	2%	7%	10%	80%	1%	9%	0.50	1.24	220	9%	13,402	46%	19%	11%
Hawaii	22%	34%	16%	27%	2%	22%	0.27	1.08	15	6%	14,616	60%	N/A	0%
Idaho	2%	5%	9%	84%	3%	33%	0.61	1.31	26	19%	8,244	21%	23%	19%
Illinois	0%	5%	11%	84%	7%	16%	0.37	1.10	229	8%	11,788	34%	28%	16%
Indiana	5%	9%	9%	77%	4%	17%	0.49	1.07	100	11%	11,285	28%	22%	14%
Iowa	4%	7%	11%	78%	1%	13%	0.36	1.24	69	18%	9,751	19%	26%	20%
Kansas	1%	5%	7%	87%	1%	23%	0.44	1.50	77	11%	9,028	20%	22%	14%
Kentucky	1%	2%	4%	93%	5%	16%	0.38	1.81	195	13%	14,538	53%	19%	14%
Louisiana	7%	20%	15%	59%	2%	20%	0.77	1.86	162	43%	13,700	32%	21%	15%
Maine	0%	3%	10%	87%	5%	28%	0.13	1.13	31	6%	8,092	1%	11%	10%
Maryland	6%	7%	9%	78%	2%	15%	0.32	0.99	114	12%	18,425	75%	10%	5%
Massachusetts	5%	6%	5%	85%	6%	47%	0.38	0.65	46	8%	14,496	62%	7%	4%
Michigan	6%	11%	13%	69%	7%	18%	0.43	1.07	139	1%	12,051	36%	15%	12%
Minnesota	4%	9%	12%	75%	2%	4%	0.28	0.73	57	6%	14,213	56%	8%	5%
Mississippi	3%	6%	7%	84%	0%	32%	0.89	1.68	58	15%	9,821	13%	23%	17%
Missouri	2%	4%	6%	88%	5%	17%	0.52	1.31	165	11%	12,198	43%	29%	18%
Montana	1%	4%	7%	89%	5%	22%	1.11	1.74	19	25%	3,931	0%	22%	20%
Nebraska	0%	2%	13%	85%	1%	5%	0.68	1.27	24	10%	9,942	29%	31%	22%
Nevada	13%	15%	9%	63%	1%	21%	0.64	1.30	39	43%	12,074	40%	20%	9%
New Hampshire	1%	2%	3%	95%	5%	11%	0.33	0.85	15	10%	12,837	52%	5%	3%
New Jersey	9%	10%	12%	70%	4%	21%	0.41	0.83	63	21%	14,498	73%	7%	5%
New Mexico	1%	3%	5%	91%	3%	8%	1.26	1.61	24	6%	8,331	16%	34%	28%
New York	8%	10%	14%	69%	8%	33%	0.27	0.94	192	9%	11,481	35%	18%	10%
North Carolina	1%	6%	9%	83%	3%	20%	0.48	1.38	211	32%	12,837	41%	12%	8%
North Dakota	0%	2%	8%	89%	3%	4%	0.60	1.46	18	40%	4,994	1%	23%	20%
Ohio	1%	6%	13%	81%	2%	21%	0.35	1.10	240	5%	12,037	42%	23%	15%
Oklahoma	2%	6%	14%	78%	5%	15%	0.75	1.58	86	15%	10,028	28%	24%	17%
Oregon	2%	6%	11%	82%	1%	26%	0.44	1.23	69	4%	12,093	36%	24%	16%
Pennsylvania	3%	7%	11%	79%	5%	30%	0.47	1.44	239	10%	11,206	19%	22%	13%
Rhode Island	1%	6%	8%	85%	15%	32%	0.29	0.82	11	-5%	15,281	63%	7%	3%
South Carolina	0%	5%	11%	83%	4%	9%	0.82	1.98	165	19%	11,879	39%	14%	11%
South Dakota	0%	3%	12%	85%	2%	17%	0.34	1.93	42	15%	5,766	0%	20%	18%
Tennessee	1%	3%	4%	92%	3%	14%	0.66	1.60	197	13%	12,968	44%	25%	18%
Texas	3%	10%	13%	75%	1%	14%	1.01	1.61	367	24%	14,145	50%	26%	14%
Utah	0%	2%	8%	90%	1%	17%	0.67	1.07	39	30%	10,600	44%	20%	11%
Vermont	0%	3%	3%	94%	2%	31%	0.31	0.72	7	5%	5,742	0%	5%	4%
Virginia	3%	10%	16%	71%	3%	15%	0.37	1.08	174	14%	14,714	54%	17%	10%
Washington	5%	10%	12%	74%	4%	21%	0.25	1.00	121	7%	13,728	53%	11%	7%
West Virginia	1%	8%	11%	80%	9%	14%	0.68	1.74	60	10%	9,729	5%	20%	17%
Wisconsin	5%	16%	14%	65%	3%	10%	0.24	0.97	76	1%	11,525	26%	14%	11%
Wyoming	2%	7%	10%	81%	9%	12%	1.24	1.75	15	11%	3,398	0%	33%	33%
U.S. Total	3%	8%	11%	78%	3%	18%	0.54	1.26	5,350	14%	12,893	43%	17%	11%

Source: TRIP analysis of U.S. Department of Transportation data



Office of the
County Board

October 11, 2016

Dakota County
Administration Center
1590 Highway 55
Hastings, MN 55033-2372

651.438.4418
Fax: 651.438.4405
www.dakotacounty.us

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

Dear Commissioner Zelle:

Thank you for the opportunity to comment on the draft Minnesota State Highway Investment Plan 2017-2036 (MnSHIP). Dakota County has reviewed the draft plan and has several comments for your consideration.

MnSHIP addresses the difficult task of establishing the priorities for maintaining and improving the State's transportation system. We acknowledge this task is becoming increasingly difficult considering the growing need to invest in preservation of the existing system coupled with mobility needs due to future growth in the region, while recognizing the limited transportation funding envisioned to be available. The growth in the 20 year funding gap from \$12 billion to \$18 billion since the last MnSHIP just four years ago is alarming.

Dakota County appreciates Mn/DOT's public engagement efforts to provide information and seek input from stakeholders to help shape the MnSHIP investment direction. Dakota County generally supports a number of strategies employed by MnSHIP, including the following elements:

- Primary highway investments will strive to preserve the existing system.
- Investment in low-cost/high-benefit highway projects as a cost effective approach to mitigate some operational and capacity needs across the region.
- Identification of the need for continued investment in selected expansion projects, including Managed Lanes.
- Progress toward ADA-compliant infrastructure.
- A section that outlines priorities for additional transportation revenues.

However, Dakota County is very concerned about the lack of investment identified for safety and mobility needs in the Twin Cities metropolitan area. This MnSHIP includes a significant reduction from previous MnSHIP plans to an already woefully underfunded mobility program. The inability to address safety, operational, and mobility issues on State highways in the County will have a direct effect on the safety, economic growth, and quality of life of those that will live and work in Dakota County over the next 20 years. Specific corridors that clearly will need attention within the MnSHIP timeframe include large sections of TH 77, TH 13, US 52, TH 3, TH 55, I-494, and I-35. Several of these corridors have safety needs that warrant particular attention.



Both the challenges faced by our transportation system, and the need for significant, comprehensive increases in transportation funding are at a point of unprecedented significance to the well-being of our state. This statement holds true from perspectives of economic competitiveness, health and safety, and the general quality of life for our citizens. With the substantial unmet transportation needs across the state, including those in Dakota County, it is absolutely critical that:

1. Mn/DOT be proactive and comprehensive in its approach to pursue a major transportation funding initiative with the legislature in 2017. MnDOT also needs to ensure it retains the ability to direct any new transportation revenues to the most pressing needs on the Trunk Highway system. Continued education of the public and elected officials on transportation needs and funding options will be critical to this end. On behalf of the Dakota County Board of Commissioners, I pledge our assistance in efforts to pursue increases in highway and bridge funding during the coming legislative session.
2. Mn/DOT be flexible in working with local agencies in developing projects that meet multiple objectives. For example, working with local agencies on project scope early in the process of developing preservation projects could result in projects that address safety and mobility issues in addition to preservation issues, resulting in better value for MnDOT investment.

We recognize that a dramatic shortage of funding and Mn/DOT's aging infrastructure are the underlying factors that restrict the MnSHIP direction to mainly preservation projects over the next 20 years, but this MnSHIP plan needs to reasonably account for traffic demands associated with planned growth in the Twin Cities region.

I thank you for your consideration and subsequent action in response to our comments.

Sincerely,



Nancy Scheweiler, Chair
Dakota County Board of Commissioners

cc: Dakota County Board of Commissioners
Matt Smith, County Manager
Steve Mielke, Physical Development Director
Scott McBride, Minnesota Department of Transportation Metro District Engineer

Friday, October 14, 2016

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

Dear Commissioner Zelle,

Thank you for the opportunity to provide comment on the draft Statewide Multimodal Transportation Plan (SMTP) and Minnesota State Highway Investment Plan (SHIP). These plans are intended to serve as a long-term vision for how we as a state will invest in our current infrastructure and grow capacity for future demand and growth, and we appreciate MnDOT's commitment to plans that reflect the needs of current and future generations.

MnDOT staff recently gave a presentation to the Metropolitan Council Transportation Committee detailing these two draft plans, and solicited feedback from members. There was one point in particular that we felt important to express both at the meeting, and to submit as comments on the draft plans.

While pleased to see that the draft SMTP articulates a commitment to meet Minnesota's Next Generation Energy Act goals, we are disappointed that the SHIP appears not to specify how transportation investments will meet or advance the same goals. Transportation in our state generates a quarter of Minnesota's greenhouse gas emissions. Reducing emissions emitted by users of our transportation system is an essential step if we are to achieve the emissions levels to which Minnesota committed under the landmark 2007 law. The infrastructure we choose to maintain and build frames the system, and largely determines the volume of climate-altering emissions we will emit in coming decades.

The two documents' inconsistency on this fundamentally important point is concerning to us, and we hope MnDOT will amend the SHIP to reflect Next Generation Energy Act commitments and find alignment with the SMTP.

Thank you for your efforts to plan for the future of Minnesota and the metropolitan region in a holistic and innovative manner. We look forward to continuing to partner with you in the years to come.

Sincerely,

Jon Commers, District 14
Cara Letofsky, District 8
Katie Rodriguez, District 1
Members, Transportation Committee

October 12, 2016

Commissioner Charlie Zelle
Minnesota Department of Transportation
395 John Ireland Blvd.
St. Paul, MN 55155

RE: Comment on DRAFT 2018-2037 20-Year State Highway Investment Plan

Dear Commissioner Zelle,

Thank you for the opportunity to provide comment on the DRAFT 2018-2037 20-Year State Highway Investment Plan (MnSHIP). On behalf of our 2,300 members representing businesses of all sizes, from all industries around the state, we appreciate the opportunity to offer our feedback.

Minnesota's state highway system is an incredibly important asset to the state. It knits together our varied communities and provides the backbone for the movement of commerce across the state. It is appropriate, then, that you and your department spent considerable time reaching out to Minnesotans to solicit their input and feedback about how the state's highway investment resources should be spent over the next 20 years. For our part, the Minnesota Chamber of Commerce has long advocated for investment in our transportation infrastructure that first prioritizes the maintenance of the system we have and then focuses on strategic enhancements to it. Not surprisingly, MnDOT's public engagement efforts found that this is also the preferred approach of most Minnesotans.¹ We agree with MnDOT's decision to use it as the basis for its decisions about how to invest its expected revenues over the next 20 years.²

We are also acutely aware of the need for additional investment into our state's transportation system. Our work in 2006 to support the constitutional dedication of the state's motor vehicle sales taxes to transportation uses, our role in helping to pass the 2008 funding bill, and our efforts over the past two legislative sessions to secure the passage of a long-term, comprehensive transportation funding bill make clear our

¹ "On average statewide, participants in the public outreach process preferred Approach B..." 2018-2037 MnSHIP, page 68

² "MnDOT used the investment priorities in Approach B as the starting point to develop the investment direction based on the results of public outreach and internal analysis." 2018-2037 MnSHIP, page 70

commitment to increased funding for the state's transportation infrastructure. In all of these efforts, we and other stakeholders have looked to MnDOT to help us articulate the why, what, and how of the state's long-term transportation funding needs. In its update of MnSHIP for 2018, MnDOT has taken steps to inform that conversation further. Its inclusion of four additional investment categories in this MnSHIP update (Facilities, Freight, Jurisdictional Transfer, and Small Programs)³ provides Minnesotans with even greater detail about the long-term needs of our highway system.

However, as you know, when calculating the state's long term transportation funding needs, two "inputs" into the calculus – inflation and bridge and pavement condition targets – have a significant impact on the multi-year "need" numbers that are produced. With regard to the former, we continue to note that the 5% inflation factor MnDOT has historically used,⁴ as well as the 4.5% factor used in this update of MnSHIP,⁵ continue to be at the upper end of the range of available indexes – including industry specific indexes like the National Highway Construction Cost Index developed by the Federal Highway Administration and an index developed by the American Road and Transportation Builders Association that measures year-over-year price increases in various categories of road construction such as steel, asphalt, ready mix concrete, fuel, sand and others.⁶ As we have in the past, we would encourage the Department to continue its efforts to refine its long-term cost forecasting to ensure it tracks as closely as possible to the experience of the industry as reflected in other industry specific indexes.

Regarding bridge and pavement condition targets, while MnDOT's aspirational bridge and pavement condition targets⁷ have changed slightly in this update of MnSHIP⁸, its targets for the condition of interstate pavement and NHS bridges appear to exceed the targets being developed by the Federal Highway Administration.⁹ We question if the department's targets are overly aggressive and unrealistic. On this point, we were pleased to see in the "Moving Forward" section of the DRAFT the discussion of MnDOT's commitment to ongoing adjustments to its performance targets in an effort to better align them with realistic expectations of system performance. We agree with MnDOT that such efforts will help to ensure MnDOT's work to manage the state highway system is supported by realistic public expectations.¹⁰

³ 2018-2037 MnSHIP, pages 12-21

⁴ 2014-2033 MNSHIP, Appendix E, page 9

⁵ 2018-2037 MnSHIP, page 28

⁶ "A Review of the Assumptions In the Report – Minnesota Moving Ahead: Transportation Funding and Financing for the Next 20 Years," Prepared by Accenture, April 2015, pages 6-8

⁷ 2018-2037 MnSHIP, page 53

⁸ This update of MnSHIP contains changes to the Departments targets for Other NHS and Non-NHS pavements

⁹ "FACT SHEET: Pavement and Bridge Condition Performance Measures - Notice of Proposed Rulemaking," Office of Transportation Performance Management, Federal Highway Administration, January 2015

¹⁰ 2018-2037 MnSHIP, page 124

In reading through this DRAFT, we did note one seeming inconsistency. The document explains that MnDOT has significantly updated its estimate of the funding needed for project delivery. In its previous MnSHIP report, MnDOT estimated that the need for project support and delivery would total approximately 11% of the MnSHIP investment program.¹¹ The total amount actually provided for project support and delivery in its fiscally constrained 2014-2033 20 year investment plan, however, was much less at roughly 8%.¹² This DRAFT suggests that new analysis has led the department to determine “that spending needed to deliver projects was 16% of the capital program,”¹³ not 8% or even 11%. The DRAFT notes that the primary reason for this change is the fact that MnDOT has delivered a number of legislatively authorized bond programs in recent years, which “tend to need additional investment in Project Delivery for right-of-way and project design.”¹⁴ The DRAFT says “MnDOT revised the analysis [of the percentage of funding needed for project delivery] based on this additional information.”¹⁵

While it certainly stands to reason that bond programs may require additional project delivery investment, it is unclear why the department would update its expectations of the needed investment in project delivery over the next 20 years when this DRAFT 20 year funding plan does not anticipate any additional bonding over the life of the plan. In its revenue outlook, the DRAFT specifically states, “Any potential bonding that comes after the adoption of this plan is not reflected in the investment direction set forth by MnSHIP.”¹⁶ What’s more, the DRAFT suggests that currently authorized bonding will only provide a small amount of funding over the 20 year life of this plan. It notes that the department is currently near its debt limit policy¹⁷ and that it will exhaust all currently authorized bond revenues by 2019.¹⁸ We wonder, then, why the department’s estimate of its project delivery needs for the next 20 years, when little bonding will be done, would be based upon the experience of the last several years, when much bonding was done. Given the significant amount of additional funding that this MnSHIP update would invest in project delivery (\$3.278 Billion over 20 years vs. \$1.33 Billion over the life of the previous 2014-2033 MnSHIP plan), we believe the seeming inconsistency in the rationale used to justify this investment is worth noting.

At a time when the needs for investment into our state’s transportation system are increasing alongside the amount of scrutiny given to how our valuable transportation dollars are currently being spent, careful and transparent planning and forecasting is

¹¹ 2014-2033 MnSHIP, pages 63-65

¹² 2014-2033 MnSHIP, page 127

¹³ 2018-2037 MnSHIP, page 70

¹⁴ Ibid

¹⁵ Ibid

¹⁶ 2018-2037 MnSHIP, page 27

¹⁷ Ibid

¹⁸ 2018-2037 MnSHIP, Appendix E, Figure E-10, page E-16

essential. We applaud you and your department for the work done to gather the public's input and assemble this report. We appreciate the opportunity to offer this feedback about the contents of the current DRAFT, and we hope that you and your team find our thoughts and comments helpful as you work to put the report into its final form. Should you have any questions about our input, please do not hesitate to reach out to me.

Sincerely,

A handwritten signature in black ink, appearing to read 'DBL', with a long horizontal flourish extending to the right.

Douglas B. Loon
President

/DBL

cc:

Senator Dibble
Representative Kelly
Minnesota Chamber of Commerce Federation Partners

October 14, 2016

Commissioner Charlie Zelle
Minnesota Department of Transportation
395 John Ireland Blvd
St. Paul, MN 55155

RE: Comment on DRAFT 2018-2037 20 Year State Highway Investment Plan

Dear Commissioner Zelle,

I am again disheartened by the political nature of MnDOT's Draft State Highway Investment Plan (MnSHIP). While I applaud the very professional engineers and planners at the Department who develop the core of this proposal, I fear it has been subsequently corrupted into a vehicle for pushing a specific agenda influenced by politics rather than a forward looking solution for our transportation system and its needs.

MnSHIP's long-term goals, planning and cost estimating are tied to the vision created by the Dayton Administration in 2011 with the Minnesota GO 50 year vision and thus may be politically flawed. The MnSHIP executive summary states that the MnSHIP plan "provides a strong linkage between policies that have been formulated in the Minnesota GO 50 year vision and statewide multimodal plan" both developed under the auspices of the Dayton administration.

The Minnesota GO 50 year vision looks at such priorities as global warming and climate change mitigation, environmental health and justice, bicycle planning, pedestrian walk planning, and even racial equity and disparities and these and other priorities from the Minnesota GO plan are then factored in to decision making on future Minnesota transportation planning and funding.

The Chamber of Commerce's submission of comments on the MnSHIP plan rekindled a number of concerns I had throughout the 2015-2016 legislative session. The inflation figures used by MnDOT continue to be the most vexing and puzzling issue. The consistent assumption by MnDOT that construction costs will rise faster than most other industry indices seems to imbue a mentality that this is a foregone conclusion and the only solution is to ask for increasing funds to cover the rising costs. I am most dismayed that there seems to be no effort within MnDOT to control this and 'bend the cost curve'. We all share in wanting to lower construction costs so that MnDOT can get more construction done with each dollar. I strongly encourage a more proactive mentality within MnDOT that seeks better usage of your own funding – whether by policy change or requests for legislative action.

An analysis by the Minnesota Center for Fiscal Excellence in 2015 looking at the period from 2003-2014 found glaring differences in annual inflation figures for MNDOT when compared to national averages. This 2015 analysis showed Minnesota averaged 5.7% annual increase from 2003 to 2014 while the same Federal National Highway Construction cost index averaged just 0.9% which works out to an increase over this time period in the Minnesota rate by 87.5% versus only 10.1% on the national average.

MNDOT's use of a 5% inflation figure is just not even reasonable and greatly drives up the long term needs cost estimates when factored over long-term 10-20 year transportation spending plans.

The separation between requests for future project delivery funding related to bonding projects and MnDOTs own expectations of future bond funds presents another puzzling matter. The Legislature attempted to provide funding to complete a group of major, long-awaited capacity improvements in the bonding bill which passed the House. But MnDOT, advising the Governor, sank special session negotiations over fears of lack of readiness for the projects, despite many of them having received MnDOT funds in the past through Corridors of Commerce, CIMS, or elsewhere. Finally, the Legislative Auditor said MnDOT has been ill-prepared to handle influxes of funds through bonding or 'unanticipated' sources, despite them coming from the Legislature for years. To me, it appears MnDOT is working *not* to address the significant needs of the transportation system in order to fit a predefined agenda.

Another aspect to look into is aesthetics. With limited dollars is it really necessary, as your office of Bridges and Structures noted in its aesthetic guidelines, that it was reasonable for a type "A" (more expensive, higher profile) bridge to cost an additional 15% above a conventional bridge due to aesthetics? A type "B" lesser important structure may only cost 10% more. When you take a lot of 10% and 15% increases over conventional costs one could say this adds up to real money. Not to mention the planning to incorporate and the extra costs to accommodate multi modal transportation needs into these structures and the additional costs this adds to these projects. Maybe we also need to go back and review bidding practices and how MnDOT scores and lets out projects with some of the recent developments of huge delays and cost overruns on projects like the St. Croix river crossing bridge, Highway 53 relocation and bridge project in northeastern Minnesota and the Winona Highway 43 bridge project.

Finally, I have grave concerns with the MnDOT planning process when the long term "needs" of the state system rise from \$600M per year to \$900M per year in just 4 years. So if we had passed the major transportation funding bill the governor and MNDOT wanted last year, we would turn around now only to learn we are \$300M a year short. This once again shows no confidence in MnDOT and its "needs" estimates. MnDOT needs to minimize its political agenda and get back to the priority of fixing and maintaining roads and adding new capacity as the system requires it and use reasonable methods to estimate long term costs and reasonable processes for selecting future projects.

Sincerely,

Timothy J. Kelly
Chairman, Minnesota House Transportation Policy and Finance Committee

Cc:
Senator Scott Dibble

Name:

Representative Tom Emmer

Organization:

Minnesota's Sixth Congressional District

Email address:

Rebecca.Alery@mail.house.gov

Your comment or inquiry:

I am writing today in regards to the recently introduced Minnesota 20-year Highway Investment Plan (MnSHIP).

During my meetings throughout the state, one of the most common themes I hear is the importance of infrastructure investments in the daily lives of Minnesotans and their frustrations with our current system.

While MnSHIP is ambitious, it is clear there is a significant funding gap with many projects remaining untouched. I am particularly disappointed to see the I-94 West Corridor going unfunded in this plan.

I have been impressed with the extensive MnDOT studies and plans over the years which include: the I-94 Interregional Corridor Plan (2002), the Central Minnesota Regional Freight Study (2011), and the 2028 Statewide Highway Investment Plan (2009) which all identify the need for performance-based expansions on the I-94 West Corridor. In addition to these findings at the state level, the Federal Highway Administration (FHWA) identified this corridor as "highly congested" from the Twin Cities up to St. Cloud, with freight congestion levels only forecasted to stretch to the North Dakota border by 2040.

As you know, I-94 West cuts straight through Minnesota's Sixth Congressional District and is a major regional transportation corridor. Because of this crucial highway, the Northwest suburbs have been growing and thriving at an incredible pace – and this is only expected to grow in the next 20 years.

Thankfully, due to recent state efforts there was an expansion of this stretch of highway, but much more needs to be done. Currently, I-94 West is one of the heaviest traveled stretches of road in the state. In fact, while Highway 101 in Rogers to Highway 23 in St. Cloud represents only 1.6% of MnDOT's Interregional Corridor System, this stretch is responsible for 40% of the congestion in the system. Whether they are heading to a local shop to purchase goods or services, heading to the cabin, commuting to their job in the Twin Cities or simply trying to make it to their child's recital or school conferences, Minnesotans are sick of the current situation plaguing this interstate.

Minnesota's economy relies on trade, commerce and the ability of businesses to move their products to local and international markets. To truly meet the needs of those who use this vital corridor, it is imperative that I-94 West be included in the 20-year plan.

I encourage you to include the I-94 West Corridor in this plan so that we can reduce congestion, improve safety, enhance economic development, increase mobility and quite literally keep Minnesotans moving.

I appreciate your consideration, and please do not hesitate to reach out with any questions or for further discussion.

Sincerely,

Congressman Tom Emmer

2016 Minnesota State Highway Investment Plan (MnSHIP)

City of Minneapolis staff comments:

- General: Overall the plan is very well written and organized. The document is easy to comprehend and effectively captures the different outcomes that would be obtained depending on how state funds are prioritized and allocated.
- General: Continue the work that has been done with the FHWA on the Ladders of Opportunity initiative, to mitigate the impacts of freeways. This will require additional resources not highlighted in this plan.
- Page 13: Jurisdictional transfers are mentioned throughout the document as a stewardship management strategy. While this may reduce the state's financial burden it should be noted that local agencies will need to reprioritize or reallocate resources to take on additional infrastructure. This will result in accelerated deterioration of local systems if additional local resources are not identified.
- Page 14: Intelligent Transportation Systems (ITS) is called out in bold within the text. More detail should be provided on what technologies are being considered to improve safety and mobility.
- Page 16: It is recommended that the state continue to aggressively pursue managed lanes throughout the region to help promote more reliable travel times, faster emergency response times, and more reliable transit service. While significant funding has been identified to expand the MnPASS program, the plan should call out an additional action item for MnDOT to work with cities, counties, the Met Council, and CTIB to come up with funding strategies to maximize FHWA and FTA funding for MnPASS wherever possible.
- Pages 19-20: The City commends MnDOT for including an objective that values healthy communities, which is defined as "fiscally responsible decisions that respect and complement the natural, cultural, social, and economic context. Integrate land uses and transportation systems [that] leverage public and private investments". The document also recognizes the impacts of climate change and what must be done to mitigate weather impacts. With regard to natural environments it is recommended that that state set sustainability goals to reduce road salt usage, to increase pollinator plantings within its right-of-way, and use solar and LED technology where possible. Funds used to construct bicycling and walking projects that serve all user groups have been proven to increase non-motorized mode share, thereby reducing carbon emissions.
- Page 28: The graph and text very effectively shows that as time progresses user fees and other projected revenues combined with inflation will not keep up with infrastructure needs. The City supports legislative efforts that will create long-term sustainable transportation funding. As mentioned on pages 124-125 there are several ways to stretch existing dollars, however improvements in technology, process efficiencies, and strategic investments will only go so far.
- Page 41: The plan does a great job of highlighting the Toward Zero Death program and appropriately recommends substantial resources to this initiative. With regard to

trends, it should be noted in the plan that motorcycle deaths make up a large percentage of fatalities throughout the state. There is also a disproportionately high number of pedestrian and bicycle injuries and fatalities, especially in urban areas (when compared to mode share). The plan should call out both statistics and should call out the need to identify resources to help reduce crashes for these modes.

- Page 43: With regard to ADA compliance, it appears that there are funding and project timing challenges with curb-cut installations. It will take 20 years to retrofit the entire system. The City of Minneapolis is faced with similar challenges and encourages the state to identify additional funds to achieve system-wide ADA compliance for curb-cuts sooner than the 20-year horizon. The City also encourages the State to identify sidewalk gaps and deficiencies, and develop a plan to address them.
- Page 65: A solid community process was used to reach the conclusion that Option B is the best statewide approach to funding different types of projects. There are several funding scenarios that are presented in which the public was polled at several community meetings. Option A focuses investments on repairing and maintaining existing state highway pavements, bridges and roadside infrastructure. Option B balances investments in repairing and maintaining existing state highway infrastructure with strategic investments in improving travel time reliability. Option C focuses investments on improving travel time reliability, non-motorized investments, and regional and locally-driven priorities. While Option A is favored by outstate residents and Option C has stronger Metro-wide support, city staff concur with the majority of statewide residents and with MnDOT staff that Option B is the most prudent option; balancing asset management with improvements in mobility.
- Page 83: With regard to bidding strategies it should be noted that more early coordination is needed between local agencies and the state with regard to construction staging and roadway closures. Sometimes a staging method that creates cost savings for a state project may have additional costs for local agencies or may negatively impact local businesses and/or neighborhood livability. Similarly, early communication between the state and local agencies is needed so that state and local projects don't create mobility and traffic problems when there are multiple construction projects or events that require street closures in a given area.
- Page 124: With regard to innovation, MnDOT has done a great job in finding creative ways to deliver complicated projects in less time and at less cost. Both the Hastings Bridge and the I-35E bridge projects are good examples of this. The City encourages the state to continue to research and use materials that lengthen the useful life of transportation infrastructure and employ construction methods that not just save time and money but also reduce community impacts.



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 Minnesota State Highway Investment Plan

Dear Mr. Gieseke,

The recently drafted Minnesota State Highway Investment Plan lays the groundwork for the capital investment priorities for the 12,000 miles of state highway system throughout the next 20 years. The state highway system plays an integral role in the state's quality of life and economic competitiveness. Minnesota residents and businesses depend on a strong, connected and safe state transportation network.

Safe, connected and efficient travel through and within Washington County depends on the state highway system. The addition of bicycle infrastructure and accessible pedestrian infrastructure as categories will help to improve alternative transportation safety and connectivity within the region. Long term planning and the creation of funding priorities for this system is key to keeping the regional and state transportation 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".

Wayne Sandberg
Deputy Director/Assistant County Engineer



October 14, 2016

Commissioner Charlie Zelle
Minnesota Department of Transportation
Mail Stop 100
395 John Ireland Blvd
St. Paul, MN 55155

Dear Commissioner Zelle:

Thank you for this opportunity to comment on the Draft Minnesota Highway Investment Plan. The members of the Southwest Corridor Transportation Coalition appreciate the challenges that the state faces in improving the transportation system with limited dollars. The return on investment for strategic highway improvements that increase economic activity will result in benefits over and above the cost of these investments. Working with local businesses and community leaders, important projects can be identified as we have experienced with investments made through the TED program and Corridors of Commerce. Our Coalition believes that more emphasis should be placed on these types of investments.

The new MnSHIP plan for 2018-2037 includes an additional \$3 billion over the previous MnSHIP plan in projected revenue. Our members would like to see more of those resources directed to safety and mobility needs. The policy for any additional funding over what is projected to be available should definitely prioritize projects that have been waiting many years for funding and that would provide greater mobility for businesses looking to locate or expand in Minnesota.

Compared to the previous MnSHIP plan, the investment direction in this plan has significantly less funding to meet mobility needs and regional and community improvement priorities. The last plan identified \$520 million for Twin Cities Mobility, representing 3.5% of total funding. This plan provides only \$240 million for Twin Cities Mobility and \$25 million for Greater Minnesota Mobility (formerly IRC) which represents just 1.2% of total funding available. With growth in the state population and continued economic growth, we have concerns about the extremely low level of investment in these areas leaving unfinished highway corridors with remaining two-lane segments.

A major concern for the Southwest Corridor Transportation Coalition is the reduction in the amount of funding for Regional and Community Improvement Priorities (RCIPs). The previous MnSHIP plan allocated \$570 million or 3.8% of total funds to this category. The new plan allocates just \$310 million or 1.5% over the next 20 years. The strong support for programs like TED and Corridors of Commerce demonstrates that important projects that involve the business community as well as local partners can be completed with these funds. The coalition strongly urges a greater allocation of resources in this area to not only allow for needed highway projects but to leverage outside dollars and build more political support for highway funding overall.

The coalition strongly supports the new freight funding category in the MnSHIP plan. Freight movement is a major issue on US Highway 212. With growing levels of freight traffic, this corridor, which was not designed to handle the projected traffic levels, will become more dangerous and more expensive for residents and businesses as the cost of transporting products and the time spent in traffic congestion grows.

We understand that the state will have limited resources for transportation investments in the future and those resources need to be directed to provide a high return on investment. Therefore, previous investments in major corridors should be maximized by making needed improvements to close gaps and target dollars to areas with clear safety problems and high growth rates.

As demonstrated by the increase in business growth along the new Highway 212, the Southwest Corridor Transportation Coalition feels strongly that completing this major corridor to a four-lane facility from Chaska to Norwood Young America will improve economic development and prosperity in the region while leveraging previous investments to maximize their impact on the region. The remaining two-lane gaps need to be upgraded to four lanes to handle increasing population growth, increasing employment levels and increasing freight movement.

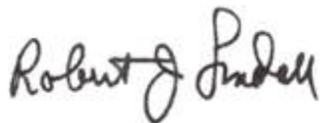
According to information in the Thrive 2040 projections, the bulk of future growth in population, households and employment will occur in the outer suburbs. Carver County is projected to experience a population growth from 91,042 people in 2010 to 151,720 people in 2040 with a corresponding increase in households from 32,891 in 2010 to 60,550 in 2040. The additional 60,678 residents are expected to generate an additional 212,373 trips per day in the region. We need to plan now for highway and transit expansion that will maintain mobility, safety and a high quality of life in this part of the metro area. In the coming twenty years, traffic volumes in year 2030 are forecast to increase on Highway 212 to between 21,000 and 28,000 vehicles per day, or two to three times the existing traffic volumes, exceeding the capacity of the existing two-lane facility. US Highway 212, a high-priority interregional corridor, has a high volume of truck traffic, currently estimated at 1,850 heavy trucks per day.

Safety on our roadways is another area that should receive more attention in this plan. High crash rates on Trunk Highway 5 and the two-lane segments of Highway 212 and other major corridors continue to leave too many fatalities and injuries. Improving livability in the region will require investments that reduce crashes and improve safety on our roadways. While spot improvements are important, expanding highways with higher traffic volumes to 4 lanes provides the highest safety benefit. As noted in the Crash Facts report from the Department of Public Safety, most fatalities occur on 2-lane highways. Maintaining the pavement on Highway 5 and the two-lane portions of Highway 212 will not significantly reduce crashes. Clearly, safety is a critical component of livability but the plan is short on investments and plans to reduce crashes.

The Southwest Corridor Transportation Coalition and Carver County have worked to revise plans for improving US Highway 212 to reduce the level of investment required while still providing a significant return on that investment. The low-cost/high-value approach will allow for a continuous four-lane corridor, one that improves safety for all people and freight while mitigating congestion and improving access in this major commerce corridor.

On behalf of the Southwest Corridor Transportation Coalition, I would like to urge MnDOT to recognize the value of needed improvements to interregional corridors like US Highway 212 and TH5 as necessary steps toward meeting the goal of improving stewardship of the system that has been developed with previous investments. While our members recognize the need for additional resources, we would urge more investment of projected revenue to RCIPs and mobility needs.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Lindall". The signature is written in a cursive style with a large initial "R".

Robert J. Lindall
President

cc: Southwest Corridor Coalition Members
Senator Julianne Ortman
Rep. Joe Hoppe
Rep. Jim Nash
Deb Barber, Metropolitan Council