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## MNSHIP PUBLIC COMMENTS AND RESPONSES

The Minnesota Department of Transportation released the draft 2023-2042 Minnesota State Highway Investment Plan for public review on September 25, 2023. The public comment period was advertised in the state register, through social media and email listservs, and letters from the MnDOT Commissioner. Regional public hearings were held in October 2023 at the following locations:

- Baxter (October 5) – 7694 Industrial Park Road
- Carlton (October 11) – 1630 County Road 61
- Rochester (October 13) – 2900 48th Street NW
- Willmar (October 13)– 2505 Transportation Road
- St. Paul (October 18) – 390 Robert Street N

The public hearings were hybrid events with people able to attend in-person and via web conference. The comment period ended on November 27, 2023.

During the public comment period, MnDOT received over 80 individual comments via letters, e-mails, online comments and comments the public hearings. This document summarizes the comments received through this process and provides MnDOT's responses to the comments.

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## PUBLIC COMMENT TOPICS

The comments received have been categorized into the following topics:

- Climate Resilience
- Construction
- Efficiencies
- Engagement
- Freight
- Funding
- General Support
- Highway Mobility
- Local Partnerships
- Main Streets-Urban Pavements
- Needs
- Pavement
- Pedestrian and Bicycle
- Performance Measures
- Project Delivery
- Project Selection

- Project Specific
- Rail
- Revenue
- Roadside Infrastructure
- Safety
- Transit
- Transportation Equity
- Vehicle Miles Traveled Reduction
- Wildlife

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## SUMMARY OF CHANGES MADE TO FINAL DOCUMENT

### CLIMATE RESILIENCE

On page 18, changed climate-appropriate vegetation to climate-adaptive vegetation.

### HIGHWAY MOBILITY

On pages 20-21, included Travel Demand Management in the following bullet point:

- Active Traffic Management, Travel Demand Management and transit-supportive investments. Operational improvements to help manage traffic flow, which include variable message signs, freeway ramp metering, dynamic signing and re-routing, dynamic shoulder lanes, reversible lanes and lane-specific signaling. Investments to increase traveler options.

And added the following sentence to the Highway Mobility strategy description:

- MnDOT also supports TDM initiatives led by local and regional agencies that may not be eligible for state highway investment. The Metropolitan Council recently completed a [Regional Travel Demand Management Study](#) that identifies TDM strategies for the Twin Cities region.

On page 109, included Travel Demand Management in the following bullet point:

- Active Traffic Management (ATM), Travel Demand Management (TDM) and transit-supportive investments

On page 110, added the following sentence:

- MnDOT also supports TDM initiatives led by local and regional agencies that may not be eligible for state highway investment.

On page 112, added the following bullet point to System Investment Strategies:

- Support TDM strategies led by local and regional partners

On page 140, added the following work plan item:

- Update Highway Mobility Needs in Greater Minnesota - The Greater Minnesota Mobility Study was completed in 2018. MnDOT will update the needs identified in that study using newer data to reflect shifting mobility needs in Greater Minnesota.

On pages 20, 21, 109, 110 and 127, replaced E-ZPass express lanes with managed lanes.

## PERFORMANCE MEASURES

On page 16, added the following sentences to the Pavement and Bridge investment category descriptions:

- Smooth pavements are critical for the safe and efficient of movement of goods in Minnesota. A robust network of bridges is vital for the safe and efficient movement of goods in Minnesota.

## VEHICLE MILES TRAVELED REDUCTION

On page 142, the following text has been added to the workplan item - Implement Greenhouse Gas emissions and vehicle miles traveled legislative requirements:

- MnDOT has put together a Transportation Greenhouse Gas Emissions Impact Mitigation Working Group to implement the Greenhouse Gas Emissions Impact Assessment for capacity expansion. By February 1, 2024, the working group will develop recommendations for the impact assessment, an impact mitigation plan and options to fund greenhouse gas emissions mitigation activities.

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## RESPONSES TO PUBLIC COMMENTS

### CLIMATE RESILIENCE

#### GENERAL COMMENTS

NAME/ORGANIZATION	COMMENT
Sarah Strommen, Minnesota Department of Natural Resources	<p>The careful management of native prairie and threatened and endangered species within the road right-of-way is critical to supporting the state's biodiversity goals. Please consider the addition of a commitment to ensure maintenance of the right-of-way supports Minnesota's biodiversity goals.</p> <p>Please consider adding that native plantings/seeding can also be augmented with annual cover crops to support stabilization.</p> <p>The DNR recommends using the term "climate-adaptive vegetation" instead of "climate-appropriate vegetation" as more forward-looking language.</p> <p>Please consider adding a commitment to replace water crossings with climate resilient designs that allow waterbodies to maintain connection with the floodplain.</p> <p>Please consider language that culvert replacement should accommodate aquatic organism passage in addition to climate resilience enhancements.</p>

NAME/ORGANIZATION	COMMENT
	<p>Please consider providing additional detail on methods for improving resilience. There is a short mention of native seeding and planting but added detail would be helpful.</p> <p>Please consider mentioning the health benefits to all people of having access to outdoor spaces for recreation and the importance of our transportation system to help facilitate that access.</p> <p>Please consider increasing natural resource-focused goals (e.g. implementing climate enhancements at more than 10-20% of culverts would significantly enhance natural resource outcomes.</p> <p>Pre-construction vegetation should be replaced: however, there are often opportunities to enhance vegetation beyond what existed pre-construction. Please consider adding the option of "native trees and shrubs" to discussions on vegetation replacement.</p> <p>Please consider the addition of safety and connectivity strategies/technology for wildlife and for public safety (e.g.; driver safety in deer-vehicle collisions, conservation concerns in elk/moose collisions).</p> <p>Please consider the addition of fencing around stormwater ponds to decrease Canada goose depredation on surrounding crop fields.</p>

**RESPONSE**

The MnSHIP investment direction includes funding climate resilient infrastructure improvements. This would fund climate resilience enhancements on 10-20% of highway culverts. The investment direction also includes funding for green infrastructure which includes native plantings and seedings, including replacement of trees. Descriptions of these investments are found in Chapter 1 and the types of investments funded in MnSHIP are found in Chapter 6.

MnDOT is in the process of developing a [Resilience Improvement Plan](#) that will guide climate resilience investments. MnDOT is committed to planting and maintaining native vegetation on state highway right-of-way and continuing to partner with the Department of Natural Resource, the Minnesota Board of Water and Soil Resources and other stakeholders.

**DOCUMENT EDITS**

On page 18, changed climate-appropriate vegetation to climate-adaptive vegetation.

**BICYCLING COMMENTS**

NAME/ORGANIZATION	COMMENT
Ben Werner	I praise this plan for its thoroughness. I am grateful you all are working so hard to make our great state better. That being said, this is an enormous amount of information to digest and very difficult for a layperson to navigate. I am an urban planning student, and I still struggled to read this plan. More work needs to be done to make this accessible.

NAME/ORGANIZATION	COMMENT
	<p>Across the board the plan mostly looks good to me. I see the need for the investments being made. I would urge you to be more aggressive on your bicycling and climate resiliency goals. Bicycling is critical to reducing health concerns and environmental impact. Climate change is also real, and happening. If you take New York as an example, they are being hit by intense flooding and weather changes. We need to do more to prepare for, and reverse the trends we are seeing.</p> <p>I'd like to see more resources put into climate resilience, bicycle infrastructure and efforts to reduce driving as a part of this plan.</p>

**RESPONSE**

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. The investment direction in the draft plan includes an increase in funding for climate resilience and bicycle projects. However, there are still many pavement, bridge and other infrastructure needs on the state highway system that require investment.

**DOCUMENT EDITS**

No changes made.

**GREEN INFRASTRUCTURE COMMENTS**

NAME/ORGANIZATION	COMMENT
Blank	<p>Please incorporate specific, prescriptive requirements for tree plantings along road right of ways so that they are a part of MnDOT's projects and ongoing maintenance. Planting of trees provides much needed noise buffering, shading, wind protection, and water quality services, and the cultural service for our communities. Our highways are dangerous with side winds, and trees can help. Other states include trees in margins, we need to as well.</p>

**RESPONSE**

The MnSHIP investment direction increases investment for green infrastructure on state highway right-of-ways including trees and other native plants. It also increases investment for living snow fences which reduce blowing and drifting snow on state highways. In 2021, MnDOT established targets for increasing native planting and seeding but does not currently have targets established for tree planting nor tree replacements for those trees removed as an impact of construction. MnDOT will continue to explore options for replacing and planting new trees in the state highway right-of-way and as part of construction projects.

**DOCUMENT EDITS**

No changes made.

## CONSTRUCTION

### COMMENTS

NAME/ORGANIZATION	COMMENT
Blank	Stop doing road work to rip it up months to a couple years later seems like a waste of time and money and it's inconvenient as well.

### RESPONSE

MnDOT prioritizes good stewardship of assets on the state highway system which include pavements. The department understands that highway construction can be inconvenient for state highway users. MnDOT plans and prioritizes projects with a goal to maximize pavement life and minimize disruption for the travelling public as much as possible.

### DOCUMENT EDITS

No changes made.

## EFFICIENCIES

### COMMENTS

NAME/ORGANIZATION	COMMENT
Doug Loon, Minnesota Chamber of Commerce	<p><b>Moving Forward</b>                      The final chapter of MNSHIP opens with the following: “Despite increases in funding, MnDOT does not have enough funding to meet all of its capital highway needs. MnDOT will use strategies and process improvements to ensure that the state achieves the maximum positive impact from all the investments on state highways. The strategies will help close the gap between desired outcomes and the projected outcomes of MNSHIP.”</p> <p>The department’s commitment here is laudable. But it must go further. Its efforts over the next 20 years to live up to this pledge must be quantifiable – and they must demonstrably stretch the value of each dollar invested by taxpayers into the transportation system. The department made a similar commitment in 2015 as part of its Transportation Finance Advisory Committee (TFAC) report “Minnesota Moving Ahead: Transportation Funding and Financing for the Next 20 years.” That report also recognized the need for “all transportation providers and the state to address a portion of [the unmet system funding] needs by working more efficiently and effectively, being innovative in solutions and operations, and using technology to produce a higher quality product.” In 2015, the TFAC report pegged the percentage of the state’s unfunded needs that were to be met through an increased focus on efficiencies at 15%.</p> <p>Applying that 15% efficiency expectation from TFAC in 2015 to MNSHIP’s current unmet need of \$1 Billion per year sets the expectation that at least \$150 Million per year of that unmet need be met through an increased focus on delivering projects and maintaining the system more efficiently. To its credit, MnDOT is well on its way to achieving this. Since 2015, MnDOT’s efforts to find savings through efficiencies has, on average,</p>

NAME/ORGANIZATION	COMMENT
	<p>resulted in more than \$80 Million per year being reinvested into the system. But over the next 20 years, the projected annual unmet need of \$1 Billion requires that the department essentially double its efforts. And it requires that this work be tracked and quantified, that otherwise unfunded projects or work advanced and funded as a result be identified and reported on, that the department be held accountable for the total expected value of this work over the next 20 years, and that its current estimates of the system’s 20 year unmet needs be reduced accordingly.</p> <p>Minnesota businesses want the state’s transportation system to be well-maintained and strategically enhanced, but they also expect to receive the greatest value for every dollar invested in this critical infrastructure.</p>

**RESPONSE**

Thank you for acknowledging MnDOT’s efficiencies work over the last few years. MnDOT will continue to analyze and track project efficiencies every year as required with a goal of reaching 15% in efficiencies and redirecting those resources to help meet unmet needs. Efficiencies are reported as part of the [Major Highway Projects report](#).

**DOCUMENT EDITS**

No changes made.

**ENGAGEMENT**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
Katie White, City of Minneapolis	<p>Minneapolis Public Works staff participated in the online funding allocation activity as part of public engagement. While our recommendations provided a different funding allocation than the MnSHIP draft, the activity itself and draft report has provided transparency into how the final numbers were identified. Thank you for using this process on a concept that has been traditionally difficult to translate for non-technical groups. We appreciate being provided with a summary of the benefits and burdens of the MnSHIP draft as reviewed by the Equity Work Group.</p>

**RESPONSE**

Thank you for your comment.

**DOCUMENT EDITS**

No changes made.

## FREIGHT

### FREIGHT TRAFFIC COMMENTS

NAME/ORGANIZATION	COMMENT
Doug Loon, Chamber of Commerce	Concerning Trends in System Stewardship, Highway Mobility, and Freight. We are concerned that even with historic investments in our highway infrastructure by both the federal and state governments, MNSHIP notes that risks related to the upkeep of our current infrastructure – namely pavements and roadside infrastructure – remain “high.” Similarly, even with the deployment over the next 20 years of additional resources into highway mobility, “delay for most highway users will increase from current levels,” particularly in the metro area. While this certainly underscores the increased inconvenience of travelling throughout the metro in the years to come, we are particularly concerned about the negative impact it is likely to have on the movement of goods and commerce. Among other things, major freight bottlenecks around the state will go unaddressed. With the U.S Department of Transportation estimating that freight tonnage will grow by roughly 50% by 2050, what will this mean for businesses and consumers, given that delays “negatively impact freight movement in Minnesota and potentially lead to higher costs for businesses and customers”?
Margaret Donahoe, Transportation Alliance	The MnSHIP plan should acknowledge that freight traffic will be increasing significantly. The Statewide Freight System Plan states that by 2040, the forecast indicates total volume of 1.8 billion tons, an increase of 80 percent overall from 2012 levels, with 63% of the freight moving by truck.

### RESPONSE

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. Public engagement as part of MnSHIP showed that Highway Mobility was one of the lower priorities for investment.

If population and travel trends continue, delay is likely to increase in the Metro area. However, if MnDOT is successful at meeting its per capita vehicle miles travelled targets, then delay would be reduced from current levels. Freight movement would be one of the largest beneficiaries of the reduction in VMT. MnDOT is currently updating the [State Freight Plan](#) which will articulate a more detailed strategy to support reliable movement of freight in the coming decades.

On page 21, the plan states, “Projections show that the volume of freight is expected to grow 25-45% by 2040, according to the U.S. Department of Transportation.”

### DOCUMENT EDITS

No changes made.

### TRUCK WEIGHT COMMENTS

NAME/ORGANIZATION	COMMENT
Mark Wegner	Since pavement management and bridge management together represent over 50% of the needs, it would be helpful to insert somewhere in the Plan what the impact of heavier trucks would do to the maintenance costs.



NAME/ORGANIZATION	COMMENT
	The MN legislature, over the past 10 years has carved out heavier vehicle exemptions for dairy, lumber, etc., and it would be helpful to inform the legislature the impact of their policy changes with respects to heavier trucks on the long-term maintenance costs that MNDOT ultimately would bear.

**RESPONSE**

Heavy trucks do cause wear and tear on state highway pavements and bridges. However, MnDOT designs that infrastructure to withstand weight from commercial vehicles. MnDOT's pavement data shows little to no issues with load related distress due to heavy vehicles. Bridges that can no longer safely carry heavy trucks are load posted so that trucks do not use them. This rarely occurs on state highway bridges and is more likely on the local system.

**DOCUMENT EDITS**

No changes made.

**FUNDING**

**GEOGRAPHIC DISTRIBUTION COMMENTS**

NAME/ORGANIZATION	COMMENT
Charles Carlson, Metropolitan Council	As recommended at the Programming Update Workgroup (PUW) in 2023 and approved by MnDOT leadership, 43.5% of the future capital funding will be allocated to the Metro District starting in 2028. Other stateside set-asides will continue to be split approximately 50/50 between Metro District and Greater Minnesota. In addition, other statewide competitive programs may also have a different distribution such as the Minnesota Highway Freight Program, which has a 60% soft target for Metro District based on the statewide freight needs, or the Highway Safety Improvement Program (HSIP), which is based on crash statistics. We believe that discussions should continue on whether highway mobility funding should flow through the new statewide formula. We believe that mobility funding, where the needs are nearly 100 percent in the Twin Cities, should be excluded from a formula that will only return 43.5 cents on the dollar to the metro area.

**RESPONSE**

Geographic funding distribution questions are outside the scope of MnSHIP. MnDOT staff will continue to work with Metropolitan Council Staff and other partners on funding distribution through the Programming Update Workgroup.

**DOCUMENT EDITS**

No changes made.

**FUNDING CHANGE COMMENTS**

NAME/ORGANIZATION	COMMENT
<p>Katie White, City of Minneapolis</p>	<p>Revenue Outlook Recent allocations from State and Federal sources have provided significant amounts of funding for transportation and related infrastructure. This is a remarkable time in history and we are eager to work with our partners to advance essential projects on relevant roadways to improve livability for everyone across Minneapolis and Minnesota.</p> <p>An interesting outcome of this increase in funding is the rather narrow slice of recipients, specifically the State (from Highway User Tax Distribution funding and federal sources) and the counties (from CSAH and regional sales tax sources). MnDOT and the counties are now advancing projects at an unprecedented pace to deliver needed investments that is supported by the additional revenues. Minneapolis is happy to partner on these projects that are being moved up years earlier than anticipated in order to deliver needed benefits. However, this means that the local share of cost participation required for these projects is being requested from the city at a schedule much sooner than we had previously budgeted for and in some cases without notification that would allow for the ability to budget for requested cost participation elements. For example, MnDOT has moved up the following bridge projects and the associated local cost share due to IIJA resources: Penn Ave over I-394, Dunwoody Bridges, 20th Ave S over I-94, and Nicollet Ave over I-94. The City’s financial picture has not changed in the same way that MnDOT’s (and the counties) have and is actually seeing a decrease in Municipal State Aid funds due to more eligible cities coming online for funding. Increased pressure for projects in earlier years is not something that can be absorbed easily and balanced against the needs on the local transportation system. The narrative and potential solutions surrounding this dynamic are missing in the MnSHIP report. Minneapolis is an enthusiastic supporter of the new IIJA and IRA funding matching grant capacity provided by MnDOT for competitive federal grants. It would be much harder for cities like Minneapolis to confidently pursue these essential projects without the support of MnDOT in this manner. We would look to MnDOT, perhaps through MnSHIP, to consider similar resources to be made available for projects that MnDOT is advancing more quickly because of their own IIJA resources. Alternatively, the concept of cost participation itself could be re-evaluated.</p> <p>Minneapolis thanks MnDOT for being a supportive partner on the Reconnecting Communities grant opportunity for Olson Memorial Highway in North Minneapolis. Similarly we have had very productive conversations with West Area and Metro District staff on advancing funding applications on University Ave NE and University and 4th Avenues SE. We additionally appreciate the extra work that MnDOT has invested in planning for the future of Central Ave NE. These collaborations are in the best interests of the community and also work ahead of the future asset preservation needs on the roadways.</p>

**RESPONSE**

MnSHIP funding is limited to use on state highway right-of-way and for trunk highway purposes and does not cover local costs as part of those projects. However, MnDOT understands that cost participation can be a burden

for local communities. The Statewide Multimodal Transportation Plan includes a work plan item to "Revise Cost Participation for Cooperative Construction Projects and Maintenance Responsibilities between Local Units of Government Policy." The review, starting in early 2024, will identify when and under what circumstances MnDOT will cover a greater share of project costs.

**DOCUMENT EDITS**

No changes made.

**GENERAL SUPPORT**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
<p>Doug Loon, Minnesota Chamber of Commerce</p>	<p>On behalf of the Minnesota Chamber of Commerce, representing 6,300 employers and their more than 500,000 employees across the state, I want to thank you for the opportunity to provide comment on the department’s DRAFT 20 Year State Highway Investment Plan (MNSHIP), released in September 2023.</p> <p>Thank you, too, for the opportunities you’ve provided us to engage with you and the department on behalf of our members and the state’s broader business community. As an appointed member of the Minnesota Freight Advisory Committee and the department’s Policy Advisory Committee, you have given me wonderful opportunities to offer regular and direct input and feedback to you and your colleagues at the department about the important role that transportation plays in moving our state’s economy forward. I value those opportunities and am grateful to be a part of the department’s work.</p> <p>We engage in the transportation policy arena to ensure Minnesota maintains a safe, reliable, and efficient multimodal transportation system that provides for the needs of employers and employees by delivering projects as efficiently, cost-effectively and transparently as possible.</p> <p>We appreciate the significant work that has gone into preparing the DRAFT MNSHIP, in particular incorporating the significant, ongoing transportation funding increases provided during the 2023 legislative session. Ensuring the report accurately reflects the amount of money the department will have to spend over the next 20 years is essential to its usefulness as a funding roadmap for the state.</p>
<p>Wayne Sandberg, Washington County</p>	<p>I am writing on behalf of Washington County to provide our comments and input on the draft MnSHIP. We appreciate the opportunity to participate in the development of the plan and want to ensure that the transportation needs of our county are adequately addressed in the plan. First and foremost, we would like to express our gratitude for the ongoing collaboration between Washington County and MnDOT. Your commitment to maintaining a strong partnership has allowed us to work together effectively to improve the transportation infrastructure in our county.</p> <p>We appreciate your efforts to quickly respond to the funding changes from the 2023 legislative session so they could be included in this plan. While the additional funding</p>

NAME/ORGANIZATION	COMMENT
	provides new investment opportunities, we agree that there will still be unmet needs in the state through 2042, as the plan notes.

**RESPONSE**

Thank you for your comment.

**DOCUMENT EDITS**

No changes made.

**HIGHWAY MOBILITY**

**GENERAL COMMENTS**

NAME/ORGANIZATION	COMMENT
Mel Odens, Kandiyohi County	Improving accessibility and safety, there has been a big push for preservation and then switched to more mobility focused in our district- is expansion being allowed in to address safety, mobility, freight concerns- wondering how to read that.

**RESPONSE**

The plan has limited investment in Highway Mobility and no investment in strategic capacity expansion. Other programs such as Corridors of Commerce may fund expansion projects. That program is outside of MnSHIP. The focus of the MnSHIP investment direction is on maintaining existing state highway infrastructure.

**DOCUMENT EDITS**

No changes made.

**TDM COMMENTS**

NAME/ORGANIZATION	COMMENT
Charles Carlson, Metropolitan Council	The Council just completed a Regional Travel Demand Management (TDM) Study. We would encourage MnDOT to add language in MnSHIP regarding the importance of TDM activities and how they could fit into the MnSHIP investment categories. We also support the increase in funding and broadening of the potential uses of highway mobility funds to include roadway improvements related to transitways on the state system.

**RESPONSE**

Thank you for your comment. Changes to the plan are shown below.

## DOCUMENT EDITS

On pages 20-21, included Travel Demand Management in the following bullet point:

- Active Traffic Management, Travel Demand Management and transit-supportive investments. Operational improvements to help manage traffic flow, which include variable message signs, freeway ramp metering, dynamic signing and re-routing, dynamic shoulder lanes, reversible lanes and lane-specific signaling. Investments to increase traveler options.

And added the following sentence to the Highway Mobility strategy description:

- MnDOT also supports TDM initiatives led by local and regional agencies that may not be eligible for state highway investment. The Metropolitan Council recently completed a [Regional Travel Demand Management Study](#) that identifies TDM strategies for the Twin Cities region.

On page 109, included Travel Demand Management in the following bullet point:

- Active Traffic Management (ATM), Travel Demand Management (TDM) and transit-supportive investments

And added the following sentence to the investment strategies section:

- MnDOT also supports TDM initiatives led by local and regional agencies that may not be eligible for state highway investment.

On page 112, added the following bullet point to System Investment Strategies

- Support TDM strategies led by local and regional partners

## GREATER MINNESOTA MOBILITY NEEDS COMMENTS

NAME/ORGANIZATION	COMMENT
Margaret Donahoe	Highway mobility continues to languish with \$1.2 billion set aside for this area over the next 20 years versus the identified need of \$6.6 billion during that timeframe. With this level of funding congestion will increase in the Metropolitan Area, impacting the movement people and goods. In Greater Minnesota, it's not clear exactly what the needs are for mobility. The MnSHIP plan references the Greater Minnesota Mobility Study completed in 2018. The study's Advisory Committee preferred to treat the two years of funding (2022-2023) as pilots for implementing this study. After these projects have been selected and programmed, MnDOT had planned to look at updating the study with new data. At a minimum, it was recommended that MnDOT update the study data prior to the MnSHIP update.

## RESPONSE

Thank you for your comment. A change to the plan has been made below.

## DOCUMENT EDITS

A work plan item has been added to page 140:

- Update Highway Mobility Needs in Greater Minnesota - The Greater Minnesota Mobility Study was completed in 2018. MnDOT will update the needs identified in that study using newer data to reflect shifting mobility needs in Greater Minnesota.

**LIMITED FUNDING COMMENTS**

NAME/ORGANIZATION	COMMENT
Lyndon Robjent, Carver County	<p>Chapter 2. Existing Conditions and Trends</p> <p>1. Carver County respectfully requests for chapter 2 to quantify reliability and delay needs for the full State Trunk Highway system including the non-National Highway System (NHS) designated roadways.</p> <p>a. The Plan outlines that travel time reliability is currently tracked on the NHS and performance outcomes for the Twin Cities are primarily related to the performance of the interstate system. Including non-NHS designated roadways in reliability and delay analyses would be consistent with the pavement condition, bridge condition, and fatal and serious injury crash performance measures, which include the full trunk highway system.</p>
Lyndon Robjent, Carver County	<p>Chapter 6. Investment Direction</p> <p>3. Carver County respectfully requests for the MnSHIP investment direction to fund strategic capacity investments for State Trunk Highways.</p> <p>a. The Plan investment direction for ‘Highway Mobility’ funds Active Traffic Management (ATM), spot mobility improvements, E-ZPass lanes, and transit supportive investments but does not fund strategic capacity highway project investments.</p> <p>i. Strategic capacity highway projects are necessary in growing areas served primarily by trunk highways where existing obsolete rural undivided two lane highways create safety hazards and unreasonable congestion and delay for the traveling public. Strategic capacity investments on State Trunk Highways often address some of the most critical safety needs.</p> <p>4. Carver County respectfully requests for MnSHIP investment direction to be revised to meet performance measure targets for safety and travel time reliability.</p> <p>b. The MnSHIP investment direction does not meet the delay performance measure of 9 minutes per person per weekday with delay in the Twin Cities Metro expected to rise from 9.7 minutes per person per weekday to 11-12 minutes. Also note this delay performance measure does not include analysis or projection of delay on the non-NHS.</p>

**RESPONSE**

Travel Time Reliability is a federal measure calculated using a nationwide dataset that is limited to the National Highway System. Identifying mobility needs on the non-NHS would require a different measure or dataset. The delay measure for the Twin Cities area covers all state highways including those off the National Highway System. However, mobility needs on the NHS are the priority in MnSHIP and have limited funding in the investment direction.

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. Public engagement as part of MnSHIP showed that Highway Mobility was one of the lower priorities for investment. Strategic Capacity is the lowest priority for Highway Mobility in the metro area. Meeting the needs for Highway Mobility and Safety are also not possible while also maintaining state highway infrastructure to an acceptable level. The MnSHIP investment direction does

include increased investment for safety improvements on the state highway system but does not meet all safety investment needs.

**DOCUMENT EDITS**

No changes made.

**MEASURES COMMENTS**

NAME/ORGANIZATION	COMMENT
Katie White, City of Minneapolis	<p><b>Mobility and Delay</b>                      Minneapolis has deprioritized measures regarding mobility and delay in our investment planning. For example, we no longer prioritize Level of Service to determine capacity needs and our modeling assumptions for VMT growth are often 0% and sometimes assumes negative growth. We recognize that MnDOT is subject to additional regulations that emphasize these measures more than our own. Mobility needs can be met through the development of the EZ Pass system identified in MnSHIP, of which Minneapolis is supportive. The policy position of Minneapolis remains that we are not in favor of adding lane miles within the city’s borders and support the conversion of existing lanes to accommodate the EZ Pass program (as opposed to adding lanes for this purpose).</p>

**RESPONSE**

Highway Mobility investments in MnSHIP prioritize active traffic management, spot mobility improvements and E-Zpass lanes over highway capacity expansion. MnDOT will continue to work with the City of Minneapolis on any state highway projects that are within its borders.

**DOCUMENT EDITS**

No changes made.

**ROADWAY EXPANSION COMMENTS**

NAME/ORGANIZATION	COMMENT
Blank	<p>Given the worsening climate catastrophe, there must be absolutely no road expansion, and only road reduction. We need to see a removal of highways in favor of low speed, narrow, bike and pedestrian friendly routes. The expansion MNDOT should be pursuing is a massive expansion in rail routes across minnesota, not automotive roads. Road expansion doesn't work and is a failure for society. Roads already take up too much valuable space that could be devoted to housing, parks, plantings, and much more societally beneficial uses. Wake up, MNDOT and stop driving us off a climate catastrophe cliff.</p>
Blank	<p>It's incredibly disappointing to see \$1.2B for highway mobility. MN has the highest lane miles per capita of any state in the Union. Why do we need to add more? We don't. How does this relate to the state's VMT and GHG reduction goals? It doesn't. Mobility investments will be used to devastate more EJ communities and destroy the planet. This is in direct conflict with the State's stated goals and values.</p>

NAME/ORGANIZATION	COMMENT
	If a budget document is a statement of values, I don't believe this investment direction matches the goals in the SMTP or legislative mandates.
Ben Picone	MnDOT has already expanded our highways well beyond what they should be. Subsidizing vehicular traffic at the rate it does, especially with increasing the number of lanes on highways, allows residents to sprawl further and further outside the core and accelerates climate change. Building out of a congestion problem is impossible, and instead MnDOT should be investing in alternatives for residents to move around the region.

**RESPONSE**

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Based on that feedback, the plan has limited investment in Highway Mobility and no investment in strategic capacity expansion. Highway Mobility investments support transit projects such as arterial Bus Rapid Transit, where applicable. The MnSHIP investment direction also has increased investment for pedestrian and bicycle infrastructure on state highways to create a safe, accessible system for all. These investments alone are insufficient to meet MnDOT’s VMT per capita target and the state's Greenhouse Gas Emissions goals. Achieving those targets will require collaboration and coordination across the state beyond this plan. This includes planning and funding of projects led by MnDOT that are not part of MnSHIP such as inter-city rail, electric vehicle charging stations, and safe routes to school.

MnSHIP is limited to state highway roadway construction. The revenue identified in this plan cannot be spent on rail projects. MnDOT is involved in the development of inter-city rail, but those projects are funded from other sources. MnDOT is currently updating the state rail plan with information on those projects. More detail is available here: <https://talk.dot.state.mn.us/state-rail-plan>.

**DOCUMENT EDITS**

No changes made.

**LOCAL PARTNERSHIPS**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
Charles Carlson, Metropolitan Council	We support the increase in funding for the Local Partnerships investment category as Metro District cities and counties continue to invest millions of dollars each year in MnDOT’s system. These partnership dollars can help many of these locally-led projects become a reality. If additional revenues come to MnDOT, this is an area that could use additional funding.

**RESPONSE**

Thank you for your comment.

**DOCUMENT EDITS**

No changes made.



## MAIN STREETS-URBAN PAVEMENTS

### GENERAL SUPPORT COMMENTS

NAME/ORGANIZATION	COMMENT
Charles Carlson, Metropolitan Council	We applaud the addition of the new Main Streets/Urban Pavements investment area as this is a major need in the metro. This investment area will require significant resources to address the multimodal and equity needs along many of these corridors, particularly on the minor arterial system, which has generally lacked investment. We would like to propose to joint study with MnDOT Metro District in 2025 to better understand and prioritize corridors under this new investment area within the metro area.
Katie White, City of Minneapolis	Main Streets/Urban Pavements MnDOT has many roads within Minneapolis that function as core urban streets, not traditional highways. These include: Central Ave NE (TH 65), University Ave NE (TH 47), University and 4th Avenues SE, Olson Memorial Highway (TH 55), and Hiawatha Avenue (TH 55). Lyndale Ave S (TH 121) represents a relic of urban highway expansion that sticks out as being out of context with the neighboring community. Based on the proposal in the MnSHIP draft it appears likely that the Main Streets program will have a special emphasis on roads like these that fall under MnDOT’s jurisdiction but operate as important community connectors. We will continue to partner with MnDOT on roadways like these to work towards ADA compliance and bicycle system completion in our city.

### RESPONSE

Thank you for your comments. They will be shared with MnDOT Metro District staff.

### DOCUMENT EDITS

No changes made.

### COORDINATION COMMENTS

NAME/ORGANIZATION	COMMENT
Chris Webb, Southwest Regional Development Corporation	Urban pavements, or Main Streets, for small communities a lot of these projects are really transformative, but when you talk to those communities that there is somebody from MnDOT to work with those communities in advance to help identify those projects. If there is a way to plan in runway to talk to cities ahead of time, that would be helpful for these projects.

### RESPONSE

District staff works with communities to identify local needs on these main street corridors as part of the 10-year Capital Highway Investment Plan, project identification and scoping process. Funding for Main Streets/Urban Pavements projects will help fund some of those needs. MnDOT will also be increasingly focused on corridor planning to help identify and plan for local and regional needs.

### DOCUMENT EDITS

No changes made.

## NEEDS

## COMMENTS

NAME/ORGANIZATION	COMMENT
<p>Doug Loon, Minnesota Chamber of Commerce</p>	<p>“Needs” Put Minnesota on an Unsustainable Path  MNSHIP originally projected the state would have \$31.5 Billion in revenue to invest in the state highway system over the next 20 years. This amount is inclusive of significant increases in federal funding through the recently passed Infrastructure Investment and Jobs Act (IIJA), one of the largest federal investments in transportation infrastructure in recent memory.</p> <p>Additionally, as noted above, the DRAFT MNSHIP reflects the passage of significant new investments in the state’s transportation infrastructure made by the Legislature in 2023. That legislation contained sizeable increases in the various taxes and fees that Minnesotans pay to fund the maintenance and strategic expansion of our transportation system. Taken together, these tax and fee increases will bring an additional \$5.2 Billion into the state highway system over the next 20 years – ultimately providing the department with \$36.7 Billion in total revenue to invest in the state highway system over the next 20 years.</p> <p>But even with historic levels of federal investment and massive increases in the transportation-related taxes and fees paid by Minnesotans, MNSHIP estimates that the state highway system’s “unmet needs” over the next 20 years will total a whopping \$20 Billion. Put simply, the state would need to somehow realize an additional \$1 Billion PER YEAR in added revenue over the next 20 years for the state highway system just to meet the various system needs outlined by the department in MNSHIP.</p> <p>It is true that federal officials may find a way to increase the amount of funding available to states over the next 20 years. But understanding the historic size and scope of the increased funding provided through IIJA leaves one to wonder just how much we may expect the federal government to help address this \$1 Billion a year unmet need.</p> <p>Similarly, it may be that state policymakers and legislators will find ways to increase funding for the state system over the next 20 years. But understanding that the tax and fee increases enacted in the 2023 session begin to “max out” these traditional funding sources (and Minnesotans’ ability and willingness to pay even higher amounts in transportation-related taxes and fees) paints a challenging picture for how the state can reliably expect to meet the unmet needs of the system in the years ahead.</p> <p>Despite massive increased investment by the federal and state governments in the very recent past, the department is still forecasting a mammoth, \$1 Billion a year in unmet needs. With no realistic path to meeting these unmet needs over the next 20 years, we believe it is time for the department to reassess and reevaluate its methods and processes for identifying and calculating “needs” within the system.</p> <p>There has always been a significant difference between the system “needs” and the amount of funding available. It is clear this will continue. This reality begs a reasonable question: What is the ultimate utility of a process that develops, itemizes, and quantifies</p>

NAME/ORGANIZATION	COMMENT
	a seemingly ever-expanding universe of “needs” when even historic infusions of state and federal resources leave us well short – roughly \$1 Billion per year – of realizing that ideal?

**RESPONSE**

MnDOT is required to identify performance-based needs as part of the MnSHIP process. An aging system and increased costs due to construction cost inflation have grown those needs significantly since the last plan. The increased federal and state revenue has reduced the state highway unmet need by approximately 20%. It is now in-line with the unmet need identified in the 2017 plan. Until MnDOT has revenue growth in-line with construction cost inflation, the state highway unmet need will continue to grow. MnDOT remains committed to finding efficiencies in how we deliver projects to help address a portion of the unmet need. We recognize that the transportation system will never be fully funded and the MnSHIP process is one tool we have to help us prioritize investments.

**DOCUMENT EDITS**

No changes made.

**PAVEMENT**

**FUNDING COMMENTS**

NAME/ORGANIZATION	COMMENT
John Welle, Aitkin County	The proposed plan places more emphasis on bridge, I assume at expense of pavements. I am concerned there is too much focus on bridge and not enough on pavement. We have pavements in bad condition in rural MN (Aitkin county) whereas bridges are in good condition, so concerned this plan will continue to worsen pavement condition in greater MN.

**RESPONSE**

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. MnDOT increased investment in Bridge Condition due to emerging needs in that area. Pavement Condition investment will still be increased compared to current investment. Pavement and bridge needs are not evenly distributed around the state. Some regions may look different than others in terms of infrastructure condition.

**DOCUMENT EDITS**

No changes made.

**RESEARCH COMMENTS**

NAME/ORGANIZATION	COMMENT
Dan Schellhammer	MnDOT has made a significant investment to research new materials and techniques at the MnROAD facility. Research has proven that some of these materials will work better

NAME/ORGANIZATION	COMMENT
	than current materials, cost less, and be more sustainable. There is a disconnect between research and implementation. MnDOT should do a better job incorporating these successes into pavements.

**RESPONSE**

MnDOT has benefited from research from the MnROAD facility and periodically reviews the research to determine benefits to the agency. MnDOT will continue to fund the MnROAD research program and look to improve implementation of that research.

**DOCUMENT EDITS**

No changes made.

**CONDITION COMMENTS**

NAME/ORGANIZATION	COMMENT
Bruce Tanquist	I have worked in pavement design for over 30 years, and I disagree with the way pavement condition is presented in this report. The good/fair/poor information presented in the Pavement Condition section of Chapter 2 and the rest of the report is misleading. The Pavement Condition section of Chapter 1 states, "MnDOT preserves the structural integrity and smoothness of its pavements...." However, the good/fair/poor rating applies only to smoothness. The remaining life maps provided by MnDOT's Pavement Management Unit present a much grimmer view of structural integrity. A slight increase in remaining service life is small comfort when you understand the true condition of our trunk highway system. I would like to see an end to the deceptive practice of emphasizing smoothness data and suppressing structural data. A pavement with very little remaining life can be restored to a "good" condition with a cheap overlay. However, it will only remain so for a year or two. This type of "fix" is used far too often, creating a false sense of security in the structural integrity of our trunk highway system and wasting countless dollars.

**RESPONSE**

For network data, MnDOT collects ride and surface distress on all of its pavements annually. It is used to determine when a project should occur to meet our pavement performance targets and may be used to initially infer the suitability of a rehabilitation versus a reconstruction. In the development of the project, additional testing and life-cycle cost analyses will all be used to decide what is an appropriate pavement treatment. That data is all collected in development of individual projects and it cannot be presented as single index on a network level.

**DOCUMENT EDITS**

No changes made.

## PEDESTRIAN AND BICYCLE

### BIKE LANE COMMENTS

NAME/ORGANIZATION	COMMENT
Cindy Winters	When the term bike lane is used, would it be possible to use protected bike lanes or separated bike lanes so it is not assumed that paint on the street is sufficient for a bike lane?

### RESPONSE

Bike lanes in MnSHIP encompass painted lanes, separated and protected lanes. MnDOT may use any of them depending on the location and roadway characteristics. In some cases, a protected or separated bikeway may not be feasible.

### DOCUMENT EDITS

No changes made.

### NEEDS COMMENTS

NAME/ORGANIZATION	COMMENT
Lyndon Robjent, Carver County	Chapter 6. Investment Direction 5. Carver County respectfully requests further review of pedestrian and bicycle needs across the State Trunk Highway system related to community needs and costs and consideration of investment direction revision related to this need area. a. The total 20-year pedestrian and bicycle need across the state is estimated at \$4.6 billion, which includes the addition of 10-15 pedestrian bridges (page 61). In Carver County alone, two new grade separated pedestrian crossings of trunk highways were completed in the last five years with adopted plans showing the need for at least four new grade separated pedestrian crossings of trunk highways in Carver County.

### RESPONSE

The majority of identified new pedestrian crossings are in the Twin Cities Metro area. The needs identification is completed at a high level across the state. Project scoping may identify additional pedestrian needs beyond MnSHIP needs.

### DOCUMENT EDITS

No changes made.

### FUNDING COMMENTS

NAME/ORGANIZATION	COMMENT
Blank	Pedestrian and Bicycle - \$4.6 Billion for a statewide bicycle and pedestrian system is unwise spending. I don't believe the state government should be involved in what should be local systems. Very few people need to bike, much less, walk across the state using a

NAME/ORGANIZATION	COMMENT
	statewide master-planned system. Leave this up to localities and reallocate the money to repair pavement and bridges across the state. Thank you.
Owen Young	<p>On page B-32, the initial amount of funding towards pedestrian and bicycles was \$1.292 billion and pavement condition at \$11.708 billion. However, in chapter 6, the draft plan is based on more than in appendix B, and most of the categories for spending went up (for example, pavement condition went up to \$13.5 billion). However, pedestrian and bicycle funding went DOWN to \$1.2 billion. Why is this? Why is it that in response to more money (from both federal and state dollars), we fund bike/ped less? I believe that in response to more money coming in, bike/ped should NOT be decreased.</p> <p>I truly hope this is an error when the report was created, because a lot of ink is spilled in this report about the climate change and responsible investment, but putting safe bikeways/sidewalks along previously unbikeable/unwalkable roads reduces the amount of people who use a car on that road! Bike paths are not just a tool for recreation, they should be treated as a serious mode of transportation.</p>

### RESPONSE

The MnSHIP investment direction includes \$1.2 billion for pedestrian and bicycle infrastructure. The \$4.6 billion figure is the identified need for pedestrian and bicycle infrastructure. Infrastructure for pedestrians and bicyclists on the state highway system is the responsibility of MnDOT. It is also a legal requirement to ensure that pedestrian infrastructure is compliant with the Americans with Disabilities Act. MnDOT works with local partners to maintain this infrastructure after it has been constructed.

The total investment in Pedestrian and Bicycle is lower than the draft investment direction. This is due to a revised cost estimate for pedestrian bridges. That change resulted in a reduction of \$168 million. The outcomes for Pedestrian and Bicycle are expected to be the same or better than the draft investment direction even with the lower investment amount. The Pedestrian and Bicycle investment in the plan is an increase over current spending levels. With the additional investment in the final investment direction, MnDOT prioritized improving pavement condition, bridge condition and safety.

### DOCUMENT EDITS

No changes made.

### PERFORMANCE MEASURES

### COMMENTS

NAME/ORGANIZATION	COMMENT
Margaret Donahoe, Transportation Alliance	We agree that MnDOT should manage investments to achieve multiple objectives such as improving economic competitiveness, public health, equity and climate resilience. For example the plan should explicitly describe the safety and freight benefits of pavement and bridge investments and show more of the outcomes in various investment categories rather than maintaining outcomes in silos.

## RESPONSE

In addition to the performance measures listed in the plan, MnDOT maintains a performance dashboard at [minnesotago.org](http://minnesotago.org) where users can see performance measures across all investment areas.

## DOCUMENT EDITS

On page 16, added the following sentences to the Pavement and Bridge investment category descriptions:

- Smooth pavements are critical for the safe and efficient of movement of goods in Minnesota. A robust network of bridges is vital for the safe and efficient movement of goods in Minnesota.

## RELIABILITY COMMENTS

NAME/ORGANIZATION	COMMENT
Cindy Winters	Reliability is a measure used for vehicle traffic, but it is not for bicycle and pedestrian travel. This should be a measure for all forms of transportation. Until bicycle and pedestrian travel is measured in reliability and level of service, it is never going to get the same level of attention as vehicle travel. Active transportation is one component that will help the state reach their resiliency and climate change goals.

## RESPONSE

Reliability is a federal measure calculated using a nationwide dataset provided by the Federal Highways Administration. That data does not exist for bicyclists and pedestrians. The plan includes investments to improve the pedestrian and bicycle network along and across state highways.

## DOCUMENT EDITS

No changes made.

## PROJECT DELIVERY

### DESIGN STANDARD COMMENTS

NAME/ORGANIZATION	COMMENT
Katie White, City of Minneapolis	Project Delivery As described in MnSHIP, project delivery needs are more substantial in complicated urban areas like Minneapolis. MnDOT has recently undertaken several challenging projects within and near Minneapolis (many referenced in this comment letter) and we appreciate the department’s commitment to solving difficult problems by finding creative solutions. Page 38 of the PDF draft document says, “MnDOT strives to reduce the overall need for Project Delivery through innovative design, early project identification and shared services.” We have discovered through Hennepin County’s Lowry Avenue NE project that the MnDOT design specifications are currently driving a significant impact to project delivery costs and right-of-way takings. This county-led project would impact a MnDOT facility and the MnDOT design standards are leading to recommendations that would harm the community and drive-up costs. We hope that

NAME/ORGANIZATION	COMMENT
	MnDOT can be relied on to modify its standards from statewide to context-sensitive in order to provide a more nuanced design on this and other projects.

**RESPONSE**

Thank you for your comment. Design standards are not part of MnSHIP but they are an important fact in how projects get constructed in the state. Your comment will be shared with MnDOT's design and State Aid staff.

**DOCUMENT EDITS**

No changes made.

**COST COMMENTS**

NAME/ORGANIZATION	COMMENT
Blank	Mndot needs to find ways to reduce project delivery costs. One solution is to hire additional staff to more work internally vs. consulting out. MnDOT plans are also usually more detailed than needed. Surfacing plans could be simplified. MN Counties have much lower project delivery costs. Another idea is to reduce the amount of management in Mndot and increase the number of technicians/workers actually preparing the plans. I've seen most districts add additional ADE's over the years.

**RESPONSE**

Project delivery costs have grown in recent years as the costs of construction have rose sharply. The project delivery costs in MnSHIP do not include MnDOT salaries which are paid through our operations budget. Shifting from consultants to internal staff would reduce project delivery costs but would strain the operations budget. MnDOT will look to continue to find ways to deliver projects efficiently with limited resources.

**DOCUMENT EDITS**

No changes made.

**PROJECT SELECTION**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
Margaret Donahoe, Transportation Alliance	With limited resources, consideration and priority should be given to the number of people impacted by some investments versus others. How many people are impacted by bicycle and pedestrian investments versus pavement and bridge investments? The safety category includes investments in bicycle and pedestrian infrastructure in addition to the category specifically identified as bicycle and pedestrian investments.
Margaret Donahoe, Transportation Alliance	How will the additional \$5 billion in new revenue from the passage of Chapter 68, 2023 Session Laws be invested? The distribution and impact of those funds should be identified including projects specifically designated by the legislature.



## RESPONSE

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. MnDOT has a responsibility to provide a safe, accessible system for all users of state highways, including pedestrians and bicyclists. Pavement and Bridge investment is still the largest investment in MnSHIP. Combined they are over 50% of the investment direction.

MnSHIP is not project-specific so it does not include individual projects that can be funded with the additional revenue. Figure 5-14 shows how the new revenue will be spent by investment category. The projected outcomes of all MnSHIP investment are shown in Figure 6-2.

## DOCUMENT EDITS

No changes made.

## PROJECT SPECIFIC

### HIGHWAY 12 COMMENTS

NAME/ORGANIZATION	COMMENT
William Fischer	Why can't MNDOT spend the dollars needed to make Highway 12 safer? Have you driven from Highway 394 to Delano?
William Fischer	Have you driven from Highway 394 to Delano?
William Fischer	Can you pass on a road repair needed on Highway 12 just east of CR 6 overpass? Eastbound where the highway connects to the bridge over the wetland, cars and trucks will be going airborne soon and westbound there is a dip parallel to the eastbound lane. It's hard to believe MNDOT road inspectors don't see this as a hazard.
William Fischer	We see 4 lane road being connected out state Paynesville area and southern Minnesota near Mankato. What about the traffic count on Highway 12?
Paul Dimonsen	Either Highway seven or 12 need to be improved into the Twin Cities from the west. Both routes are one-way slow traffic when you get within 15 to 20 miles of the Twin Cities. So both are slow. it's not only a mobility issue but a safety issue because drivers get very aggressive and impatient on these stretches. Most of the time you'll be getting behind a slow driver and that's when people get aggressive and cause accidents.

## RESPONSE

MnSHIP is not project specific. It does not identify specific projects for funding. Project selection and identification is typically done in the respective MnDOT District. Your comment will be shared with MnDOT District staff.

## DOCUMENT EDITS

No changes made.

**MISSISSIPPI RIVER CROSSING COMMENTS**

NAME/ORGANIZATION	COMMENT
Reanne Danielson, Sherburne County Commissioner	As we see population growth along I-94 and growth of businesses that will add truck capacity to the system, would like to see some thought to acknowledging bridge expansion at river crossings, new crossings. The existing bridges have preservation and maintenance need and we would like to see larger look at needs and see expansion of bridges.
Blank	Mississippi crossings between Elk River and St Cloud are too few. Monticello and Clearwater are insufficient.  Please review density and prioritize near-term solutions.
Blank	Over the last 7 years, I have been a commuter from Big Lake to Buffalo for work. 7 years ago, I distinctly remember other in community forums expressing their frustrations with traffic going through Monticello on highway 25 over the bridge and through downtown. Among those comments others would state that they have been asking city, county and state officials for the last 15 years for another bridge, but no one would put anything in motion. Fast forward 7 years, populations have grown in surrounding towns, semi/large truck traffic has increased (with several trucks tipping over in rush hour traffic right on co. Road 11), apartments and businesses being put up, etc. With that being said, there is more wear and tear on the roads which, we have seen this summer needed to be addressed. With those closures and no other route to take, it was a nightmare driving through there. I can't even imagine what will happened when the bridge needs work and it needs to be closed and then the next closest route is 20 miles either direction. That is only going to happen quicker if no new roads and bridges are built. I sit, in average, an extra 20-40 minutes going on highway 25 daily and there is no other route to take. And if officials are worried about the environment, having that many cars sitting in traffic is not helping. No, the solution is not mandating electric cars either because the grid and plants can not handle that either, especially with the Becker plant being projected to close. Now, this issue is not only a highway 25 bridge issue. This is a statewide issue and us citizens can see plain as day the lack of communication between city, county, and state officials. None of our comments and concerns are being heard on a real level. There are things being fixed and other infrastructure matters being handled but not the ones we as communities are actually expressing our concerns about. Strongly consider updating our area and our needs.

**RESPONSE**

MnSHIP is not project specific. It does not identify specific projects for funding. Project selection and identification is typically done in the respective MnDOT District. Your comment will be shared with MnDOT District staff.

**DOCUMENT EDITS**

No changes made.

**OTHER PROJECT COMMENTS**

NAME/ORGANIZATION	COMMENT
Dorinda Epps	<p>You need to re-open the area that was previously open directly across from Brainerd International raceway in Brainerd. During NHRA nationals this worked very smoothly with the help of the Highway patrol. Now these big rigs, RV's and campers cause a huge back up on 371 going north to attempted to use a J turn to go south. Very big waste of tax payers money. This track brings in a lot of revenue during the summer and you should make it more accommodating for the people who go to this track. Not sure who came up with the idea to close this area but the obviously have never seen the traffic on 371 during the races at the track.</p>
Dennis Maciej	<p>My concern is about lighting and safety at highway intersections. The recently completed Hwy 13 at St. Patrick, MN. has no bypass lane for southbound traffic turning off Hwy 13 into St. Patrick church/bar. The 60mph limit on a curve is very dangerous. This should have been designed and reviewed with safety in mind. Another area is Highway 21 at Scott county hwy 8. This intersection is very difficult to identify at night. This needs to have street lights installed for safety and convenience.</p>
Joe Perske, Highway 23 Coalition	<p>On coalition for 5/6 years and chair this year, the corridor between Duluth and Sioux falls, reduce freight drive by almost 1,000 miles. The 4-lane will be complete from Wilmar through Foley but northeast from Foley to 35 it is a two-lane road death trap-freight, bus, ag traffic and drivers get aggressive. We would like to encourage freight and ag movement and adding 4 lanes would do that well- surrounding counties are economically struggling, so good candidate for environmental economic justice in this area. We have heard MnDOT is not looking for 4 lane expansion here and want to make sure this corridor is not neglected and Foley to Milaca and Foley to Mora are considered for 4 lanes.</p>
Wayne Sandberg, Washington County	<p>Improving mobility, accessibility, and safety for all is one of the four investment themes in the draft MnSHIP. In the past few years, Washington County has taken the lead to increase safety on the Trunk Highway 36 by leading design and being the primary funder for the Hadley Avenue, Manning Avenue, and Lake Elmo Avenue interchanges. TH 120 and TH 36 is the next priority which is also only one of four intersections in the Metro that were rated a high regional priority in MnDOT's Intersection Mobility and Safety Study. Washington County urges MnDOT to use the investment themes and the increased funding to lead design and implementation of improvements at TH 120 and TH 36.</p> <p>We are eager to continue working closely with MnDOT to address these concerns and find solutions that benefit our county and the entire state. We appreciate your commitment to improving transportation infrastructure and look forward to further discussions on these matters.</p> <p>Thank you for considering our input, and we are open to participating in any additional discussions or meetings to ensure the success of the MnDHIP. Your dedication to safe and efficient transportation is greatly appreciated.</p>
Jim Swiener, Bruening Rock Products Skyline Materials	<p>The sooner this highway can be turned into a bona fide freeway system the safer it will be for all concerned. Rebuilds to date with the inconsistency of continuity between Zumbrota and the recent rebuild are north of there, J-turn intersections with limited acceleration and deceleration lanes, retained rail crossings in the Cannon Falls, retained</p>

NAME/ORGANIZATION	COMMENT
	at grade intersections between Rochester and Zumbrota as well as other locations are a poor excuse for what is needed to be done. General inattention to the outstate portion of this highway in lieu of preference for Twin Cities roadway is disgusting and intolerable. Please finish what you start in the outstate area as was well as what was called for by earlier designs and promises.
Blank	Waters of the Dancing Sky bike trail along the Rainy River from International Falls/Voyageurs National Park to Baudette would be a great asset to the State Bicycle network. It would be wise to make investments that provide State residents with more opportunities to enjoy the watershed that includes Minnesota's only National Park.
Blank	A new toll free, International Bridge across the Rainy River should be built by MNDOT and the Canadian counterpart in International Falls, MN. Federal dollars should also be allocated as this is a very busy crossing with International Importance. Current private bridge is in very poor condition and fees to cross (which have recently increased by over 300% and won't stop there) disproportionately affect residents in the area that are underrepresented and may be located in Environmental Justice area. This is an impediment to free travel. There is a plan in place to relocate US customs and Canadian customs also may need a new building in the coming years. Property on both sides of the border may be reasonably available for this type of improvement. International Falls Comp Plan includes this as a priority. Bridge across the Rainy River in Baudette, MN was recently replaced by MNDOT. Why wouldn't MNDOT do the same for International Falls 70 miles to the east?
Blank	Highway 53 from Cook to International Falls should be improved to a 4-lane highway. There needs to be more resources allocated to the winter maintenance on Highway 53 between Cook and International Falls as many times it is in a dangerous condition during the winter months. Cook south on 53 is better although there are some dangerous locations from Virginia to 10 miles south.

**RESPONSE**

MnSHIP is not project specific. It does not identify specific projects for funding. Project selection and identification is typically done in the respective MnDOT District. Your comment will be shared with MnDOT District staff.

**DOCUMENT EDITS**

No changes made.

**RAIL**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
Jack Barbier	Stop spending so darn much money on roads, and start spending WAY more on upgrading passenger trains around this state! Not only will it take pressure (and traffic) off the roadways, it is MUCH more environmentally friendly. How many MnDOT staffers work on rail issues.... maybe ONE? Preposterous.
Owen Young	Next, I would like to address my concerns with a lack of mention of projects to build intercity rail, such as the Northern Lights Express (NLX) that was funded in the past

NAME/ORGANIZATION	COMMENT
	legislative session. This project is (at least as far as I'm aware) under the jurisdiction of MnDOT, and other intercity rail projects recently had gag orders lifted on them (Rochester-St. Paul and Dan Patch). I think at least a mention of improved rail throughout the state would mean a lot to signal MnDOT's support for rail.

**RESPONSE**

MnSHIP is limited to state highway roadway construction. The revenue identified in this plan cannot be spent on rail projects. MnDOT is involved in the development of inter-city rail but those projects are funded from other sources. MnDOT is currently updating the state rail plan with information on those projects. More detail is available here: <https://talk.dot.state.mn.us/state-rail-plan>.

**DOCUMENT EDITS**

No changes made.

**REVENUE**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
Richard Vanyo	The State of Minnesota should erect electronic toll booths at all borders and to enter the 494-694 corridor. Even as little as 00.50\$ will help to replace all existing bridges and roadways. This financial burden should not fall on those that do not use the roadways. Deteriorating roads and bridges are a huge safety concern and must be addressed daily.
Blank	Good plan but why not make all freeways/expressways tollways to help maintain the roadways, do like New York and other states payments through electronic cameras. This will help with the increase of EV vehicles to help pay their use of the roads. Also with the increase EV cycles have them required to display a license and yearly tabs.

**RESPONSE**

MnDOT has studied tolling and other revenue options in the past and MnDOT's authority to toll Interstate highways is limited by state and federal law. The ability of state to place tolls on Interstates at borders is also limited by the Commerce Clause of the US Constitution. The use of camera-based license plate tolling on Minnesota's E-Zpass lanes is something that will likely be studied in the future, along with additional studies related to electric vehicle impacts on highways and revenue.

**DOCUMENT EDITS**

No changes made.

## ROADSIDE INFRASTRUCTURE

### COMMENTS

NAME/ORGANIZATION	COMMENT
Todd Burlet	<p>“Summary of Needs” on page 57 estimates \$1.2 Billion is needed for Climate Action, including adding/improving green infrastructure along 475 miles of state highway (page 57). Adding green infrastructure is important for protecting Minnesota’s wildlife, but such efforts will far short if the habitat afforded by the green infrastructure is degraded by light pollution. Fully shielded LEDs with appropriate light level, color temperature, and active controls need to be employed along these 475 miles, and everywhere else, to reap the full benefits of adding green infrastructure.</p> <p>-this comment is based on my training and experience as an advocate for natural darkness and as president of the Minnesota chapter of DarkSky International, and my review of published scientific research.</p>
Todd Burlet	<p>Regarding “Federal Revenue Trends” page 42: “IJA includes an unprecedented amount of competitive grant funding (more than \$100 billion) to states that strive to improve outcomes in areas of safety, asset preservation, carbon reduction, climate resiliency, restorative justice, technology and more. Minnesota will be eligible to compete for this funding....”, the U.S. Department of Energy’s report DOE BTO Solid-State Lighting Program, “2022 DOE SSL R&amp;D Opportunities” states “Roadway applications have shown that required light levels can be achieved with ~50% less total generated light when using LED technology compared to previous sources.” Reducing Roadway lighting to the appropriate levels as recommended by the DOE report would improve Minnesota’s competitiveness for these federal funds in the areas of safety, carbon reduction, climate resiliency, and restorative justice.</p> <p>-this comment is based on my training and experience as an advocate for natural darkness and as president of the Minnesota chapter of DarkSky International, and my review of published scientific research.</p>
Todd Burlet	<p>Regarding Investment Category Descriptions, page 18: The draft states “Investment in this category also adapts the state’s transportation system to put less stress on the environment by reestablishing native habitats and mitigating impacts from the transportation system.” Light Pollution, which is excessive and inappropriate use of light at night, puts significant stress on our environment. Making smart decisions about roadway lighting, including full cutoff shields to prevent glare and put light only where it’s needed, using appropriate light levels such as those recommended by the Department of Energy, and using active controls that reduce or eliminate light when it’s not needed will put less stress on the environment while protecting public safety, improving environmental justice, reducing carbon, and reducing climate impact.</p> <p>-this comment is based on my training and experience as an advocate for natural darkness and as president of the Minnesota chapter of DarkSky International, and my review of published scientific research.</p>
Todd Burlet	<p>Regarding SMTP Objectives, figure 1-3, page 6: The U.S. Department of Energy’s report DOE BTO Solid-State Lighting Program, “2022 DOE SSL R&amp;D Opportunities” Recommends active roadway lighting controls that dim LED lights when there are few or no viewers. (sec. 3.2.4, page 105 of that report). The benefit to Minnesota and MnDOT is reduced energy, longer lasting lights, and improved lighting equity. These improvements directly</p>

NAME/ORGANIZATION	COMMENT
	support the stated SMTP objectives of Transportation Safety, Climate Action, and Healthy Equitable Communities.

**RESPONSE**

MnDOT’s goal is to not over light areas. It is shown that once a certain level of light is reached putting more light on the roadway does not make it safer. MnDOT lights for public safety and we have taken steps to lower any impact resulting from that lighting.

MnDOT has changed nearly 100% of roadway luminaires to LED. These luminaires all have negligible up light and they currently are all on the Dark Sky approved list. For those large luminaires that are installed on some roads we have also put in requirements on how much light can go off of the roadway. While some surround light (light just off of the shoulder of the road) provides safety for the motoring public it does not have to extend far off of the road. As manufacturers continue to make changes to their luminaires, MnDOT will continue to track improvements in lighting hardware.

MnDOT has tested several lighting controls and to date they have not proved reliable and MnDOT has not had operational success with those controls. MnDOT continues to watch and participate in the research in this area.

**DOCUMENT EDITS**

No changes made.

**SAFETY**

**GENERAL SUPPORT**

NAME/ORGANIZATION	COMMENT
Charles Carlson, Metropolitan Council	The increase in federal and state revenues has resulted in increased funding levels for many of the existing investment areas such as pavement condition, bridge condition, and highway mobility, which we support given the high needs in these areas. We’ve heard from stakeholders as part of the development of the 2050 Transportation Policy Plan that stakeholders prioritize a transportation system that is safe and multimodal, and this plan approximately doubles funding levels in these two areas.
Katie White, City of Minneapolis	<p>Safety</p> <p>We strongly support and appreciate MnDOT’s focus on safety throughout the MnSHIP document. It is important to note that some of the solutions for resolving safety concerns may come at the expense of other MnSHIP priorities. For example, the TH 252/I-94 project from Minneapolis and through Brooklyn Center and Brooklyn Park is considering investments that would create grade-separated crossings to reduce crashes on the roadway. However, this improvement could cause increased VMT, an outcome that MnDOT is specifically working against. Furthermore, mobility, reliability, and throughput goals can inadvertently create projects that encourage excessive speeding, eroding progress on safety goals. It is hard to see how the MnSHIP goals and vision as outlined in this draft are applicable to projects like TH 252/I-94 that are currently in development.</p>



**RESPONSE**

Thank you for your comment. Safety is a priority for MnDOT.

The TH252/94 project you referenced was funded by the Corridors of Commerce program. That program has its own requirements and goals that may or may not align with those in MnSHIP and Statewide Multimodal Transportation Plan.

**DOCUMENT EDITS**

No changes made.

**ENFORCEMENT COMMENTS**

NAME/ORGANIZATION	COMMENT
Blank	definitely need more speed enforcement along 371. sick of having people all but run me off the road for doing the speed limit

**RESPONSE**

Safety is a priority for MnDOT. Traffic enforcement on state highways is directed by the Department of Public Safety. Your comment will be shared with them.

**DOCUMENT EDITS**

No changes made.

**FUNDING COMMENTS**

NAME/ORGANIZATION	COMMENT
Lyndon Robjent, Carver County	Chapter 6. Investment Direction 4. Carver County respectfully requests for MnSHIP investment direction to be revised to meet performance measure targets for safety and travel time reliability. a. The Transportation Safety need is listed at \$2.4 billion over the next 20 years in order to deliver the federal Highway Safety Improvement Program (HSIP) and address intersections and segments that have a fatal and serious injury crash rate in the top 10% with additional safety investments (page 58). The investment direction implements just \$1.3 billion to this investment area.

**RESPONSE**

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. Meeting the needs for Highway Mobility and Safety are not possible while also maintaining state highway infrastructure to an acceptable level.

**DOCUMENT EDITS**

No changes made.



## TRANSIT

### COMMENTS

NAME/ORGANIZATION	COMMENT
Owen Young	Lastly, I believe that there should be far more highway BRT projects than listed. If MnDOT wants to reduce VMT, that is one way to do it, providing transit that goes where people want. This should be more of a focus. Thank you.
Blank	Reduce VMT, congestion, pollution, and size of major Metro highways by giving robust, all-day frequent bus and rail options on major highways. Nearly every highway should have SOME option of transit that links to local transfer points and to downtown. MVTA service on 77, SWT service on 212, and MT service on 94 should be the baseline service level for all highways in the Metro Area. On top of that, 94 between the downtowns and 35W South of Minneapolis should be upgraded to an automated light metro like we see in Montreal's REM. In particular on 35W. The Orange Line, 467, 460, 465 can all get stuck in the exact same traffic that comes to a standstill both before covid and after covid. In my opinion, it justifies a rail connection, but for a less expensive option, a dedicated Busway could be made with concrete barriers from just south of 46th St Station to beyond Lake St Station, with occasional entry points for emergency vehicles along the length. Watching bus after bus pass you in the busway during rush hour will be a huge incentive for people to switch. Even more so with rail. Everyone who drives on these highways should also want rail down the middle, after all, with every full train that goes by, that's HUNDREDS of cars that aren't on the road with you.

### RESPONSE

MnDOT supports bus service on state highways through bus-only shoulders, E-ZPass lanes and support for bus rapid transit projects. Metro Transit leads the identification and funding of bus rapid transit corridors in the Metro region. The number of BRT corridors in the plan are the number identified by Metro Transit on state highways. They will also be pursuing BRT on other corridors. MnDOT cannot use MnSHIP funds on transit service but can support transit projects on state highway right-of-way.

### DOCUMENT EDITS

No changes made.

## TRANSPORTATION EQUITY

### GENERAL COMMENTS

NAME/ORGANIZATION	COMMENT
Katie White, City of Minneapolis	The City of Minneapolis appreciates the opportunity to comment on the draft MnSHIP plan released by MnDOT for public comment. Over the last several years both the City and MnDOT have embarked on organization-wide work to better understand inequities in the transportation system based on race and other socioeconomic characteristics. The historic review is clear about the harms that City and MnDOT investments have caused including everything from destroying generational wealth-building to decreased physical health. Both our agencies have acknowledged these past harms and have established a

NAME/ORGANIZATION	COMMENT
	commitment to equity in future decision-making. In order to place that commitment at the forefront of its work, MnDOT should link investment decision-making explicitly with its commitment to transportation equity and the acknowledgement of past harms; a more direct link between the investment direction and addressing equity is desired.

**RESPONSE**

Transportation Equity is an emerging focus area for MnDOT. The Statewide Multimodal Transportation Plan includes a commitment to transportation equity that is continued in MnSHIP. The plan's investment direction includes a Local Partnerships investment category to better work with local communities on projects and needs. That category includes a livable communities program that will make livability improvements on urban corridors.

**DOCUMENT EDITS**

No changes made.

**MITIGATION COMMENTS**

NAME/ORGANIZATION	COMMENT
Lyndon Robjent, Carver County	Chapter 5. Development of Investment Direction 2. Carver County respectfully requests to mitigate disproportionate transportation system impacts on rural populations. a. The plan states that ‘Rural low-income populations who rely on driving could see increased burdens and cost caused by deteriorating pavement condition.’ (page 77)

**RESPONSE**

The equity review MnDOT completed on the draft investment direction found potential burdens on rural low-income populations who rely on driving along with other populations in the state. However, that analysis did not quantify whether the burdens identified were disproportionate. MnDOT will continue to monitor the implementation of the MnSHIP investment direction to ensure that there are not undue burdens on any populations throughout the state.

The MnSHIP investment direction does include a substantial increase in pavement investment compared to the draft investment direction, particularly on the Non-National Highway System. This additional investment will help mitigate potential impacts on rural populations by improving projected pavement conditions compared to the original projections.

**DOCUMENT EDITS**

No changes made.

## VEHICLE MILES TRAVELED REDUCTION

### GREENHOUSE GAS EMISSION COMMENTS

NAME/ORGANIZATION	COMMENT
Margaret Donahoe, Transportation Alliance	While the state has set a goal of VMT reduction of 14% by 2040, a growing economy means growth in freight movement and growth in population. Attempts to achieve that goal should not compromise important safety, mobility, pavement and bridge investments. If the overall goal is to reduce the carbon footprint of the transportation sector, a measure that really looks at carbon reduction rather than VMT reduction would be more productive, particularly given the Federal Highway Administration’s (FHWA) finalized performance measure that will provide State Departments of Transportation (DOTs) and Metropolitan Planning Organizations (MPOs) a national framework to track transportation-related greenhouse gas emissions (GHG), along with the flexibility to set their own targets for reduction.
Lyndon Robjert, Carver County	Chapter 8. Moving Forward 6. Carver County respectfully requests the plan and MnDOT provide greater detail and direction for Greenhouse Gas (GHG) reduction through means other than Vehicle Miles Traveled (VMT) Reduction. The plan doesn’t outline ways to achieve a reduction in GHG other than reducing VMT. a. ‘Implement Greenhouse Gas emissions and vehicle miles traveled legislative requirements’ (page 142)
Lyndon Robjert, Carver County	Appendix E: Planning Requirements 7. Carver County respectfully requests MnDOT to evaluate the goal of reducing Greenhouse Gas emissions in the transportation sector in more detail with recent legislation related to expansion and interchange projects in mind. Carver County urges MnDOT to consider modifying traditional design and operation practices to aid in greenhouse gas reduction whilst not preventing needed mobility and safety improvements. a. State Requirements, Legislative Goals for Transportation Table E-2: ‘Reduce greenhouse gas emissions from the state’s transportation sector’ (page E-7)

### RESPONSE

MnDOT has adopted both a VMT reduction target and a target for Greenhouse Gas Emissions from the transportation sector as part of the Statewide Multimodal Transportation Plan. The plan calls for an 80% reduction in emissions by 2040 which aligns with state goals for Greenhouse Gas Emissions.

As required by state legislation, MnDOT has put together a Transportation Greenhouse Gas Emissions Impact Mitigation Working Group to implement the Greenhouse Gas Emissions Impact Assessment for capacity expansion. By February 1, 2024, the working group will develop recommendations for the impact assessment, an impact mitigation plan and options to fund greenhouse gas emissions mitigation activities.

### DOCUMENT EDITS

On page 142, the following text has been added to the workplan item - Implement Greenhouse Gas emissions and vehicle miles traveled legislative requirements:

- MnDOT has put together a Transportation Greenhouse Gas Emissions Impact Mitigation Working Group to implement the Greenhouse Gas Emissions Impact Assessment for capacity expansion. By February 1, 2024, the working group will develop recommendations for the impact assessment, an impact mitigation plan and options to fund greenhouse gas emissions mitigation activities.

### ECONOMIC GROWTH COMMENTS

NAME/ORGANIZATION	COMMENT
Doug Loon, Minnesota Chamber of Commerce	<p><b>Tensions Between VMT Reduction and Investment to Support Economic Growth</b>            As noted above, the lack of additional investment in highway mobility will lead to delays that will negatively impact businesses and customers. The investment direction outlined in MNSHIP sets aside \$1.2 Billion over the next 20 years for highway mobility. MNSHIP’s own analysis, however, indicates a “need” for a total investment in this category of \$6.6 Billion.</p> <p>The underinvestment in this critical category appears to be one means of meeting the department’s goal to reduce per capita vehicle miles traveled in the state. The report notes, “More investment in this category (Highway Mobility) may jeopardize reaching the VMT (reduction) target.” But again, as the report also notes, underinvestment that leads to increased delays, “negatively impact freight movement in Minnesota and potentially lead to higher costs for businesses and customers.”</p>
Lyndon Robjert, Carver County	<p>Chapter 6. Investment Direction</p> <p>3. Carver County respectfully requests for the MnSHIP investment direction to fund strategic capacity investments for State Trunk Highways.</p> <p>b. The Plan language states “Capacity expansion projects are expensive and may hinder MnDOT from meeting its goal for reduction of vehicle miles travelled”(page 109).</p> <p>i. Even with a reduction in VMT per person, growing areas served by trunk highways will continue to add households and employment with a continued need for mobility and safety improvements to modernize two-lane rural undivided highways.</p> <p>ii. Planning for and towards VMT reduction per person does not mean critical mobility and safety projects can be left without any MnDOT funding for the next 20 years.</p>

### RESPONSE

The MnSHIP investment direction is the result of trade-off discussions with the public and transportation stakeholders. Not all needs can be met with forecasted funding. Public engagement as part of MnSHIP showed that Highway Mobility was one of the lower priorities for investment. Limited investment in Highway Mobility also aligns with MnDOT's goal of reducing VMT. MnDOT's goal for reducing VMT is per capita. Growing areas of the state may still see VMT growth due to population growth.

### DOCUMENT EDITS

- No changes made.

### HIGHWAY MOBILITY COMMENTS

NAME/ORGANIZATION	COMMENT
Tuomas Sivula	<p>The most important sentence in this Draft Plan is the asterisk under figure 7-1:            “*Highway Mobility need is reduced by \$5 billion if MnDOT is successful in meeting its</p>

NAME/ORGANIZATION	COMMENT
	<p>VMT reduction target." This is important because it identifies an important opportunity for cost savings that would actually improve quality of life for most Minnesotans; but, it misidentifies the direction of causality. MnDOT will be unsuccessful in meeting its VMT reduction target if highway capacity is expanded, as has been repeatedly proven across contexts (<a href="https://doi.org/10.1016/j.tranpol.2018.12.006">https://doi.org/10.1016/j.tranpol.2018.12.006</a>). The only way to predictably reduce VMT is to reduce highway capacity, which would also reduce the bill for pavement condition. This would free up money to pursue cheaper mobility strategies that will improve quality of life and equity of access, such as improved urban surface street connectivity and improved rural long-distance bus links, or even rural passenger rail. Currently, there is no competition on rural bus routes, the network is small and unreliable, and prices are high. While the Plan Overview mentions rural mass transit, that category has disappeared in the actual budget. If MnDOT is serious about a VMT reduction target, the plan needs to be serious about alternative modes to improve quality of life, equity, safety, and long term system resilience.</p> <p>From a financial sustainability perspective, vehicle lane miles are by far the most expensive way to make mobility improvements. Cutting the Highway Mobility budget by \$5 billion could more than double the Pedestrian and Bicycle budget. Cutting the Pavement Condition budget by 50% could almost triple the Pedestrian and Bicycle budget.</p> <p>If MnDOT is serious about a system that is financially sustainable and climate resilient, we need to be shifting money out of the most expensive, most dangerous, and least spatially efficient modes, and into the cheapest and most equitable ones. We need to do that now in order to make sure we meet the VMT reduction target, not at some nebulous point in the future when the VMT target has been met.</p> <p>One other note on induced demand: If "Projections show that the volume of freight is expected to grow 25-45% by 2040, according to the U.S. Department of Transportation;" the questions should be (1) how much of this freight is going almost directly to our landfills due to packaging or poor quality? (2) are logistics operators operating efficiently? and (3) can policy make the railroads get their act together, to make carload freight economical again and take some pressure off the roads? If we start building capacity for road freight now, it will only guarantee that this projection is a self-fulfilling prophecy.</p>

## RESPONSE

The MnSHIP investment direction does not fund roadway expansion for state highways. Highway capacity expansion is not a focus of the plan. Lane reductions may be considered on a case-by-case basis.

MnSHIP is limited to state highway roadway construction. The revenue identified in this plan cannot be spent on transit or rail projects. The MnSHIP investment direction does increase investment for pedestrian and bicyclist infrastructure on state highways.

## DOCUMENT EDITS

No changes made.

## MITIGATION COMMENTS

NAME/ORGANIZATION	COMMENT
<p>Doug Loon, Minnesota Chamber of Commerce</p>	<p><b>Unknown Cost</b> “Any expansion project programmed after February 1, 2025, that is not consistent with (new targets for Greenhouse Gas [GHG] emissions per capita VMT created by the 2023 legislature) will need to have associated mitigation programmed.” MNSHIP aims to match the amount of revenue the department expects to receive over the next 20 years with the work throughout the system that it expects to complete with those resources. But how can the department reliably do this “matching” work if expansion projects undertaken over the next 20 years will be subject to GHG and VMT targets that are currently unknown but may well require additional spending for required mitigation?</p> <p>As was noted above, the department deserves great credit for putting in the work to ensure MNSHIP is reflective of all the resources that will be available over the next 20 years, including those just approved by the legislature earlier this year. But equal care must be given to understanding and quantifying the implications of new policies, like this one, that could significantly alter the cost of delivering the MNSHIP program over the next 20 years.</p>

## RESPONSE

The legislation referenced was passed a few months before the draft MnSHIP document was published. As required by the legislation, MnDOT has put together a Transportation Greenhouse Gas Emissions Impact Mitigation Working Group to implement the Greenhouse Gas Emissions Impact Assessment for capacity expansion. By February 1, 2024, the working group will develop recommendations for the impact assessment, an impact mitigation plan and options to fund greenhouse gas emissions mitigation activities.

The MnSHIP investment direction has limited funding for capacity expansion projects so mitigation for those projects is expected to be limited in cost.

## DOCUMENT EDITS

- No changes made.

## REACHING TARGET COMMENTS

NAME/ORGANIZATION	COMMENT
<p>Brian Martinson</p>	<p>I didn't prepare any comments and I've just been reading through the plan between meetings. I apologize if my comments are not completely well informed. I've been looking at the development of the investment direction and investment direction chapters. The Governor of the state has recently approved reducing vehicle miles traveled and committing to renewable energy sources at a level that will require serious action for state agencies not least of which is MnDOT. In the document, I see what the priorities are and what the investment directions are going to be. I don't see any discussion of how the investments in the transportation system as they are planned are going to continue the level of car-dependence on single occupancy motor vehicles that we've had for the last 70 years in this country. I don't see how those investments will help us reduce vehicle miles traveled in absolute terms nor in per capita terms. I don't see how it will help us reduce Greenhouse Gases. It feels like there is an enormous</p>

NAME/ORGANIZATION	COMMENT
	disconnect between the role transportation plays in driving climate disruption and not just responding to it in terms of being more resilient to the effects of climate disruption. Feels like a huge missed opportunity for a 20-year vision document.
Blank	Overall, this plan insufficiently plans for addressing and meeting the State's greenhouse gas emissions targets of 50% reduction by 2030 and net zero by 2050. Along similar lines, the plan does not align with the climate and VMT commitments in the SMTP, which is the guiding document for MNSHIP. It focuses major investment in modes that will increase rather than decrease VMT, which is tightly linked with greenhouse gas emissions. By continuing to not prioritize VMT reduction, the plan will not result in the equitable transportation called for in the SMTP. All scientific evidence shows that drastically expanding transportation options is the only way to achieve the stated SMTP climate, equity, and health targets in the SMTP. Moving from heavily car-oriented investments is a major shift, but until we do, we will not achieve the goals in the SMTP.
Blank	This plan fails to accurately account for MnDOT's role in climate change. Please update this plan to mitigate VMT via decreasing the spending on highways and roadways.
Blank	How does this plan address MnDOT's commitment to reduce vehicle miles traveled (VMT)?

**RESPONSE**

MnSHIP supports MnDOT's goal to reduce per capita vehicle miles travelled by increasing investment for pedestrian and bicycle infrastructure on state highways to create a safe, accessible system for all while limiting highway mobility investment. The plan also includes investment for climate resilient infrastructure projects and transit-supportive projects on state highways. These investments alone are insufficient to meet MnDOT's VMT per capita target and the state's Greenhouse Gas Emissions goals. Achieving those targets will require collaboration and coordination across the state beyond this plan. This includes planning and funding of projects led by MnDOT that are not part of MnSHIP such as inter-city rail, electric vehicle charging stations, and safe routes to school.

MnSHIP funding must be spent on state highways. The investment in the plan includes improvements for all users of the state highway system including pedestrians, bicyclists and transit users. The MnSHIP investment direction includes increased investment for pedestrian and bicycle infrastructure on state highways to create a safe, accessible system for all.

**DOCUMENT EDITS**

No changes made.

**WILDLIFE**

**COMMENTS**

NAME/ORGANIZATION	COMMENT
Blank	<p>We need to put a moratorium on new roads and focus on adding wildlife over- and under-passes to all roads, especially those near any water.</p> <p>I bicycle a lot, which gives me an intimate view of roadway impacts to wildlife. I see dead</p>

NAME/ORGANIZATION	COMMENT
	<p>and dying critters all the time in the roads bisecting the Twin Cities, the suburbs, and throughout the state. I have seen palm warblers, robins, cardinals, crows, gulls, ducks, geese, opossum, raccoons, catbirds, butterflies, turtles, mink, beaver, deer, squirrels, rabbits, frogs, toads, salamanders, and on and on and on, dead or dying in the roadway. The level of destruction, devastation and violence that roadways inflict upon wildlife cannot be overstated and it is long past overdue that we start remedying the terrible situation by halting any road expansion, and begin building wildlife under- and overpasses into every single roadway, and especially those near water.</p> <p>I keep writing to the cities, parks, the counties, as well as MNDOT, about this, but the patchwork of roadway “ownership” appears to provide each with a way to shift responsibility elsewhere. It is long past overdue that MNDOT face the responsibility it has here and begin remedying by halting any expansion, and starting to add wildlife over and underpasses everywhere.</p>

**RESPONSE**

MnDOT shares your concern with maintaining natural habitat and wildlife populations. MnDOT takes steps to limit animal-vehicle interactions on state highways. There is not funding available for extensive use of wildlife overpasses and underpasses. However, they may be considered in special circumstances.

The MnSHIP investment direction does not fund roadway expansion for state highways. Highway capacity expansion is not a focus of the plan.

**DOCUMENT EDITS**

No changes made.