

September 14, 2022

Halley Turner
Minnesota Department of Transportation
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St. Paul, MN 55155
Email: stateplans.dot@state.mn.us

Dear Ms. Turner,

A detailed and aspirational Statewide Multimodal Transportation Plan (SMTP) is critical for Minnesota's transportation future. It has the potential to guide our state toward a sustainable and equitable future, and it also has the potential to facilitate and allow backward-facing investments that take us further from hoped-for outcomes if not drafted right.

Move Minnesota appreciates the opportunity to submit comments about the SMTP. Move Minnesota is the leading transit advocacy organization in the State of Minnesota and serves as transportation management organization for the City of St. Paul. We are committed to achieving a just and sustainable transportation system for all Minnesotans.

The following comments and recommendations apply to Chapter 5 of the draft SMTP. We have provided specific recommendations, accompanied by short explanations of the rationale behind each recommendation.

Our overarching recommendation is that MnDOT strengthen the SMTP's vehicle miles traveled (VMT) reduction targets. If MnDOT significantly reduces VMT over the next 20 years, it will increase transportation safety, increase community health, reduce wear and tear on our system, and reduce CO₂e emissions—in short, VMT reduction brings us closer to achieving almost every objective in the SMTP. MnDOT should take two key steps to strengthen the VMT targets.

First, the VMT targets should move from the Critical Connections section to the Climate Action section. We recognize that reducing VMT relates to critical connections and expanding transportation options—just as it also relates to system stewardship (by reducing wear and tear on the system), healthy equitable communities (by reducing particulate pollution), and so forth. However, the specific metrics for reducing VMT are critically tied to overall climate metrics, which should come as no surprise given that the VMT recommendation originated in MnDOT's climate-focused Sustainable Transportation Advisory Council. Importantly, the draft CO₂e reduction goal in the SMTP—of reducing CO₂e emissions 80% by 2040—cannot be achieved by achieving 65% zero emission vehicle (ZEV) registration by 2040, the SMTP's ZEV goal. Minnesota must reduce VMT to close this gap.

Second, MnDOT should strengthen the VMT reduction goals to put us on a path to a zero-emission transportation sector by 2050 when combined with credible projections for ZEV adoption. We request that MnDOT conduct analysis sufficient to determine an appropriate VMT reduction rate to hit this climate target. Further, given natural uncertainties about ZEV registration rates twenty years from now, we recommend that the SMTP establish a policy that

MnDOT reassess VMT goals every five years to allow the agency to adjust and align those goals with future climate realities.

We understand from previous conversations with MnDOT leadership that MnDOT shied away from a bolder VMT target because the agency did not want to commit to a VMT target it did not know it could achieve. Yet MnDOT established an array of Transportation Safety targets that are quite bold, including goals for zero fatalities and serious injuries on our immense road system. We applaud these measures and the aspiration behind them, and we ask that MnDOT staff—through the SMTP goals—take the health of our planet as seriously as they take the health of Minnesotans who live on that planet.

In addition to strengthening VMT reduction targets, we ask that MnDOT embrace the following recommendations in the final SMTP:

1. Add action 3.6 to the Open Decision Making section: “Provide the public with clear information about MnDOT’s overarching policy and project goals to help frame community engagement.” Community engagement is critical for learning and incorporating input and ideas from those most impacted, and also for building community understanding and buy-in. Yet community members should not be left with the impression that everything is on the table for discussion for every project. Instead, community members should understand the parameters within which MnDOT operates—including statutory agency goals and policies in publicly drafted plans like—and including—the SMTP. Being clear and honest about community engagement processes and parameters will, in the long run, build greater agency/community trust.
2. Add action 1.6 to the Open Decision Making section: “Use pilot projects as an experiential form of community engagement.” Particularly when introducing new infrastructure designs or operations, community members should have the chance to fully understand and experience how those new designs and operations function in their community. These pilots can also serve to reduce fear of change by providing hands-on experiences.
3. We applaud MnDOT’s goals to fully eliminate fatalities and serious injuries in the Transportation Safety performance measures.
4. Add action 1.6 to the Transportation Safety section: “Establish measures to reduce the average passenger vehicle size and weight on Minnesota roads.” Larger vehicle sizes result in higher fatality rates for vulnerable road users.
5. Add action 1.7 to the Transportation Safety section: “Implement speed limits that minimize risks to vulnerable road users, including those walking, rolling, and bicycling.” Higher speeds are directly correlated with higher fatality rates for those involved in traffic crashes. This action also relates to action 2.2 in the Transportation Safety section.
6. Add action 6.5 to the Transportation Safety section: “Establish safety standards for connected and automated vehicles to ensure those vehicles do not create unsafe conditions for those walking, rolling, bicycling, or taking transit.” Connected and autonomous vehicles are not safe for vulnerable users just because they are connected and autonomous. In fact, in some instances these vehicles were deliberately programmed to disobey traffic laws. See Associated Press (2022), *Tesla Recalls Autos over Software that Allows Them to Roll Through Stop Signs*.

7. Add a “Social Cost of Transportation” Performance Measure to the System Stewardship section. This Performance Measure should measure and publicize the total costs—including health, pollution, and other externality costs—of each major transportation mode in the state, including biking, walking, rolling, transit, and car travel. These costs should then be weighed against respective mode shares to calculate a total social cost of transportation across all modes, and the desired direction should be to lower that total social cost.
8. Amend action 1.3 in the System Stewardship section to read: “Review planned maintenance and reconstruction projects to identify cost-effective opportunities to improve safety, ~~manage congestion~~ reduce VMT, and improve and expand transportation options.” Managing congestion is an inappropriate goal for MnDOT unless that congestion relief is explicitly measured over the long-term—thereby avoiding the trap of short-term congestion mitigation inducing demand long-term—and is accompanied by goals to increase overall mobility. Explicitly looking for opportunities to reduce VMT and expand transportation options in every project is critical for MnDOT to reach its full suite of goals.
9. Add action 1.6 to the System Stewardship section: “Reduce total statewide lane miles.” The primary driver of transportation maintenance and capital costs is the size of the system. Minnesota ranks a disproportionate 4th nationwide in total lane miles even though the state is only 12th largest in land area and 22nd largest in population. Further, increased lane mileage induces demand, which in turn results in additional wear and tear on the system.
10. We strongly support the inclusion of action 3.2 (“Right size the transportation system...”) in System Stewardship.
11. Add the following context and information on the introductory page of the Climate Action section: “Importantly, the climate Performance Measures in this section apply to the full statewide system, not individual projects. To achieve these system-wide goals, MnDOT and its partners must exceed system-wide targets on individual projects to account for the fact that not all system assets are updated each year, or even decade.
12. We strongly support the inclusion of action 3.1 in Climate Action (“Integrate climate change considerations into transportation decision making...”). To make adequate progress on CO₂e emissions reductions, it is critical that the near- and long-term climate change impacts of every project are integrated into every MnDOT decision.
13. Add action 2.4 to the Climate Action section: “Maximize use of materials with low embodied carbon to reduce the carbon intensity of capital investments.” The SMTP Climate Action section heavily focuses on the climate impacts of vehicles on the road. While this is appropriate and critical, the SMTP must recognize the need to reduce the carbon intensity of materials used in building and maintaining Minnesota’s transportation system. We note that the Inflation Reduction Act provides significant funding for low-carbon materials.
14. Establish a “Job Accessibility by Bicycle and Transit Relative to Job Accessibility by Car” Performance Measure in the Critical Connections section. This should measure the percent of jobs accessible by car that are accessible by transit or bicycle in 30 minutes (current condition: 2.2% and 7% respectively) and establish a target of 25% for each mode by 2040. While we appreciate MnDOT’s goal to increase job accessibility by all modes, if MnDOT fails to narrow the modal accessibility gap the agency will perpetuate—or even increase—existing inequities. This Performance Measure could

- also take the place of—or be combined with—the “Increase in Transportation Equity” Performance Measure in the Healthy Equitable Communities section.
15. Establish a “Local Transit Speed Relative to Car Speed” Performance Measure in the Critical Connections section. It should “Measure the speed of local transit trips between destinations relative to car travel speeds.” The target should be to achieve local transit speeds no slower than 67% of local car speeds. The attractiveness and utility of transit is driven in large part by the efficiency of the service. Speed—as well as delay and reliability, which are already covered by the draft SMTP—is a critical for this service efficiency.
 16. Add action 1.6 to the Healthy Equitable Communities section: “Do not increase access to unsustainable sprawling land uses through system expansion.” MnDOT is beginning to recognize its role in shaping land use patterns in this draft of the SMTP, and MnDOT should go further and explicitly acknowledge that land uses respond to transportation asset decisions.
 17. We strongly support action 2.3 in the Healthy Equitable Communities section (“Implement equity reviews for transportation...”). To make adequate progress on delivering a more equitable transportation system, it is critical that the near- and long-term equity impacts of every project are integrated into every MnDOT decision.
 18. We strongly support action 3 and its subparts in the Healthy Equitable Communities section (“Reduce Combined Housing and Transportation Costs”). Planning for the mutual influence that land use and transportation policies and investments have on each other is critical.

Thank you for the opportunity to comment on the draft Statewide Multimodal Transportation Plan. We appreciate the draft plan’s many ambitious policies and ask that MnDOT strengthen the plan to reflect the full suite of transportation changes we know are necessary to achieve a just and sustainable future.

Sincerely,



Sam Rockwell
Executive Director
Move Minnesota