



To MDOT and the Michigan Transportation Commission
From Megan Owens, Director of Transportation Riders United
Dated August 26, 2021
Re Comments on MM2045

Summary:

Thank you for the Michigan Mobility 2045 plan's **inspirational vision** and guiding principles of a multimodal future with equitable mobility that is reliable and convenient for all users, regardless of age, income, race, or ability. It lays out a **clear case for** the need for and **benefits of expanding and improving public transit**, as public input has consistently called for.

Despite that, MM2045 provides **no clear path or quantifiable objectives of how MDOT will bring about that equitable, multimodal future**. In fact, the objectives appear to embrace more of the same narrow focus on road construction, when we need bold change in transportation policies and investments that align with all of your Guiding Principles.

Specifically, I strongly **recommend that additional Performance Measures be added** that quantify access to public transit (beyond rural access to intercity bus routes), access to safe walking and biking amenities, and reliability of public transit services and passenger rail service (detailed below in item 12).

Additionally, even as thousands of Michiganders toss out soggy memories lost to massive flooding this summer, **MM2045 largely ignores the crisis of climate change and the fact the transportation is the single largest source**. Despite Governor Whitmer explicitly telling State Department Directors in February of 2019 to work to “reduce greenhouse gas emissions by at least 26 percent below 2005 levels by 2025” and Director Ajegba serving on the Council on Climate Solutions for the past seven months, MM2045 completely fails to provide a plan or path to develop a plan to address the climate crisis.

A plan for the next two decades of Michigan transportation MUST detail concrete actions MDOT will take to ensure transportation emissions substantively drop, both immediately and over the next two decades. You cannot stay neutral or only allude to the problem without providing a clear plan to help solve it.

I look forward to an updated MM2045 that includes explicit measures for expanding public transit and for decreasing greenhouse gas emissions from Michigan transportation. Without those, the Michigan Transportation Commission should reject MM2045 as an incomplete plan that will not provide Michigan the multimodal mobility for all that its vision promises.



Detailed comments:

Thank you for the opportunity to provide in-depth feedback on Michigan Mobility 2045. I recognize the enormous amounts of time, effort, and thought put into this complex, detailed plan.

This plan has **many positive attributes** that are worth spotlighting and are much appreciated:

1. **The multimodal focus** recognizes the intermodal nature of how people and goods really get around.
 - a. Page 8 notes that MM2045 has “an increasing focus on multimodal integration”
 - b. Page 10 acknowledged that “Michigan’s roads form a robust and mature statewide system,” while regarding “passenger rail and public transportation” noting “there are clear gaps in network coverage. These modes are not accessible to all at the statewide level.”
 - c. Page 14 notes that “All the signs point to diversification in the way people and goods move around Michigan.”
 - d. Page 120 notes that “Bringing all modes and all parts of the network up to parity within the state long-range planning process is an important endeavor.”
2. The vision and principles present **an inspirational future**.
 - a. We strongly embrace and support the vision language on page 30 of “This interconnected multimodal system is people-focused, equitable, reliable, convenient for all users, and enriches Michigan’s economic and society vitality” and for “mobility options that improve quality of life, support public health, and promote resiliency.”
 - b. Similarly, on page 31, the Guiding Principle of Modal Choice is so important, especially a mobility network “for all users” that “responds to the public’s demand for more modal choices” and provides “high-quality access to jobs.” The Guiding Principle of Sustainable Communities is also a great one, especially noting “health, connected communities with convenient multimodal access” for “all people regardless of age, income, race, or ability” with “health-promoting projects that support clean air.” These are wonderfully stated.
3. The report recognizes the **lack of need for road widening** in most cases, along with the harm some roads cause.
 - a. Page 23 explains that “At the statewide scale, Michigan’s transportation network is largely uncongested and appears well positioned to handle even significant increases in travel.”
 - b. Thank you for acknowledging on page 48 that driving has “negatively affected community quality of life, the natural environment, and public health” and that “High-speed roads often negatively impact the communities they purport to serve.”
 - c. Thank you for making it clear on page 82 that “Reducing lanes ... will result in long-term savings in maintenance and replacement, reducing a portion of costs.”
 - d. Page 84 states clearly that “More than 90% of Michigan’s roadways are uncongested and not projected to experience significant future traffic congestion” and that “795 lane miles of roads under MDOT’s jurisdiction were identified as candidates for right-sizing,” even at the very conservative rate of less than 0.2 volume-to-capacity ratio at peak periods.

4. The report explains very clearly and in many ways the **need for expanded and improved public transit** for the people of Michigan.
- a. Page 15 notes that “The COVID-19 pandemic illustrated just how critical transit was to getting Michigan’s essential workers to the front lines even during the worst days of the pandemic.”
 - b. Page 16 explains that “Increased demand in urban areas . . . will require . . . expansion of mobility options like transit, biking, and walking to best meet Michigan residents’ travel needs with constrained resources.”
 - c. Page 17 spotlights that:
 - i. “Non-auto mobility options will become even more important in the years to come.”
 - ii. “By 2045, Michigan’s 65+ population is expected to increase significantly. To age in place, older Michiganders will need access to on-demand paratransit services.”
 - iii. “The number of households without a vehicle is projected to bump up from 7.9% to 9.1% by 2045.”
 - iv. “More opportunities for transit, walking, biking, and shared mobility could ... result in positive impacts on safety, emissions, and congestion.”
 - d. Page 44 and 45 points out:
 - i. “Many people in Michigan cannot easily reach jobs, education, services, and health care without a car” and that this “suppresses Michigan’s economic potential.”
 - ii. It also explains that “Job training is often not the barrier to employment; the ability to get to the job training often is” and that “For people using transit, the jobs that can be reached in an hour drops to 42,000” from an average of at least 1.1 billion jobs within an hour’s drive.
 - iii. The report explicitly states that “To expand job access for people who use transit, the most important investments are to increase the frequency and span of services.”
 - e. Page 45 adds that “Attracting and retaining younger generations of workers ... increasingly depends on availability of transportation choices,” specifically “where active transportation and high-quality transit are more available.”
 - f. Page 45 also notes that “For many rural residents, transit is a lifeline to access medical care and other essential services.”
 - g. Page 88 explains:
 - i. “In many markets, there is unmet demand for transit service”
 - ii. “In the long-term, Michigan’s transit service needs will exceed current service levels.”
 - iii. “Demand for [paratransit] services is likely to increase”
 - iv. “Directing more operational and capital funding toward transit will especially benefit Michigan’s lower-income and disadvantaged communities.”
 - h. Page 104 clearly states “No mode can move people on a corridor as effectively as transit.”

- i. Page 113 notes that “As Michiganders age and zero-households increase, demand for transit, especially flexible and on-demand services, will rise.”
 - j. Page 117: “During the COVID-19 pandemic,... it was absolutely essential to keep providing transportation for essential workers.”
- 5. The report points out several areas where **policy makers must act** to improve our future transportation.
 - a. Page 21 explains that “While CAVs could usher in safer streets, they must be able to safely operate alongside people of all ages and abilities who are walking, rolling, and biking.”
- 6. I’m glad to see on page 48 a vital note: “At a policy level, **MM2045 promotes reducing the proportion of single occupancy passenger vehicle trips** by enabling alternative modes of travel that are convenient, comfortable, and affordable.”
 - a. Please explain what policies, objectives, and performance measures will implement this policy.
- 7. Thank you for acknowledging the importance of **Environmental Justice and Equity**.
 - a. I’m pleased that page 50 states “Michigan’s transportation agencies have a duty to serve all Michiganders, including minority groups, low-income populations, the elderly, people with disabilities, and all those who traverse the state.”
 - b. Page 50 also states that “MDOT is committed to achieving transportation equity through the fair distribution of the impacts of transportation resources, projects, and policies,” recognizing that “equity is striving to provide everyone the resources and opportunities that they need to live a full life.”
 - i. Please provide more detail on how this commitment will be implemented with policy and investment changes.
- 8. Thank you for making it clear on page 83 that right-sizing on transit means “**increased service frequency and service span**; expanded service areas; increased flexibility.” What is MDOT doing to bring those about?
- 9. Page 87 – MDOT’s investments in the accelerated rail corridor between Kalamazoo and Dearborn are much appreciated, as are **passenger rail improvements** elsewhere.
- 10. Page 89 – I applaud MDOT’s commitment to “educate staff across all regions to **effectively implement designs like road diets** and to address the policy barriers that inhibit broader adoption of these tools.
- 11. Many of the 2045 Strategies in Section 3: Providing Accessibility and Mobility for All are great. It is vital to “Foster expanded equitable access to transportation options for small, rural, and disadvantaged communities,” Support the increased use of the passenger transportation system,” and to “Define, measure, and improve equitable access.” I especially applaud the commitment to “Incorporate accessibility and equity into project selection criteria and consider equity when making transportation and investment decisions” and to “Reduce the proportion of single occupancy passenger vehicle trips by enabling alternative modes of travel that are convenient, comfortable, and affordable.” I look forward to additional detail on how these strategies will be implemented.

Missing: An explicit plan to reduce climate emissions from Michigan Transportation

The biggest gap in this plan is that it fails to acknowledge that **transportation is the leading source of the climate crisis** that is already devastating our communities. It is appalling that there is no plan to substantively decrease the climate-causing pollution coming from Michigan's transportation system!

Just over the past few months, hundreds of thousands of Michiganders had to toss out soggy memories lost in the second "500-year flood" in the last seven years. Our last 500-year flood in 2014 caused \$1.8 billion in damages. And many more struggled without electricity for multiple days after the largest windstorm DTE has seen in decades.

Climate change is here. It is real and it is devastating Michigan families, just as our friends out west deal with deadly droughts and fires and millions across the globe lose homes and lives from extreme weather events worsened by the climate crisis.

Recognizing the magnitude and urgency of the climate crisis, on September 23, 2020, **Governor Gretchen Whitmer committed to build a carbon-neutral Michigan by 2050** and make major reductions in the next 3-5 years. Announcing Executive Directives 2019-12 and 2020-10, she stated:

*"The science is clear, and message urgent: the earth's climate is now changing faster than at any point in the history of modern civilization, and human activities are largely responsible for this change. **Climate change already degrades Michigan's environment, hurts our economy, and threatens the health and well-being of our residents**, with communities of color and low-income Michiganders suffering most.... We can avoid some of the worst harms by quickly reducing greenhouse gas emissions and adapting nimbly to our changing environment....*

*"Michigan must be a leader in this fight, working across all sectors – including state government – to **reduce greenhouse gas emissions as quickly as possible**. Together, we must build a carbon-neutral state. Carbon-neutrality is needed not only for the environment and public health, but also for the resilience of our economy....*

*"Michigan will aim to achieve economy-wide carbon neutrality no later than 2050, and to maintain net negative greenhouse gas emissions thereafter. To ensure steady progress toward this ultimate statewide goal, and to prevent irreparable harm to our ecosystem, residents, and businesses in the interim, **the state will aim to achieve a 28% reduction below 2005 levels in greenhouse gas emissions by 2025.**"*

- Governor Gretchen Whitmer, September 23, 2020

Even before that, **Governor Whitmer directed you to take action to decrease climate change**. Executive Directive 2019-12 on **February 4 of 2019** is explicitly directed to State Department Directors and Autonomous Agency Heads and states:

1. As chief executive officer, I commit the State of Michigan to:
 - a. Implement policies that advance the goals of the Paris Agreement, aiming to **reduce greenhouse gas emission** by at least 26-28 percent below 2005 levels by 2025.

- b. **Track and report progress** to the global community in appropriate settings, including when the world convenes to take stock of the Paris Agreement.
 - c. Accelerate new and existing policies to **reduce carbon pollution** and promote clean energy deployment at the state and federal level.
- 2. State departments and autonomous agencies subject to supervision by the governor under section 8 of article 5 of the Michigan Constitution of 1963 shall act, including when implementing and administering state laws, in a manner consistent with the commitments under section 1 of this directive.

Despite these strong commitments and clear directives and despite Director Ajegba serving on the Council on Climate Solutions for the past eight months, **MM2045 barely mentions climate change**. This plan only briefly **acknowledges climate change**, stating on page 27 that “Climate change will produce more severe and more frequent weather events.” That is far from sufficient.

As Governor Whitmer ordered, **MDOT must act and MM2045 must** detail how.

- 1. MM2045 must explain how MDOT will ensure Michigan transportation contributes to major reductions in the state’s greenhouse gas emissions:
 - a. by at least 28% below 2005 levels by 2025 and
 - b. to net zero by 2050
 - c. with appropriate interim steps.
- 2. MM2045 must also **provide detailed plans to “track and report progress”** on greenhouse gas emissions reductions.

If time is too limited to provide a full plan for greenhouse gas reduction from Michigan transportation, it must commit to **a firm and aggressive timeline** under which such a plan will be developed, in conjunction with the Council on Climate Solutions’ MI Healthy Climate Plan.

MM2045 is the plan for the next two decades of Michigan transportation. Governor Whitmer committed Michigan to be a leader in this fight. **MM2045 cannot stay neutral or provide only vague acknowledgement of climate change.**

Concerns and Recommendations:

There are numerous areas where the plan needs to be improved upon and clarified.

Top priority recommendations are as follows:

12. Expand Performance Measures for multimodal transportation

Why so little transit, rail, and active transportation in the MM2045 Performance Measures? If you don't measure it, you are unlikely to improve it. In all, 22 explicitly focus on roads and bridges, while just two relate to transit and four relate to rail, carpool lots, and active transportation combined! And while measuring safety and infrastructure condition performance for public transit is valuable, where are the system reliability transit measures? And where do you measure whether Michiganders have access to the rail, transit, or active transportation they need and whether it is of good quality?

Please add performance measures that address:

- a. Population with **access to paratransit** service ensuring mobility for seniors and people with disabilities (and work towards 100%),
- b. Urbanized population **within 1 mile of fixed route buses** (work towards 100%),
- c. Urbanized population within ½ mile of **high-frequency 24-hour transit lines**,
- d. Average number of **jobs accessible** within a 30-minute transit ride, bike trip, or walk,
- e. **Service reliability of public transit** arriving within 5 minutes of schedule,
- f. **Service reliability of passenger rail and intercity bus service** arriving within 15 minutes of schedule,
- g. Percentage of Michigan roads with sidewalks, and
- h. Percentage of residences and businesses with non-automotive accessibility.

Related, Page 48 includes a vital comment: "At a policy level, **MM2045 promotes reducing the proportion of single occupancy passenger vehicle trips** by enabling alternative modes of travel that are convenient, comfortable, and affordable." **This should be explicitly including in the Performance Measure** with quantifiable goals and plans.

13. Prioritize transit in policies and investments, not just words.

This plan states very powerfully how important expanded public transit is - on pages 15-17, 44-45, 88, and elsewhere. But it also needs to clearly **detail how MDOT will act to substantively improve Michigan's transit**.

Limited resources mean that not every area of traffic congestion can be resolved, especially while millions of people who don't drive have little to no access to vital necessities like doctors and jobs. For all the reasons this plan, MDOT must invest in ensuring every senior has some level of paratransit before spending millions to address minor traffic congestion. Without **concrete changes in policies and investment priorities**, this plan risks being more pretty words that mean nothing.

- a. Page 88 rightly notes that “right-sizing transit service hinges on accessing new, stable sources of operating funds.” So what is MDOT doing to achieve that new funding?
- b. The **Adopted 2045 Strategies**, like the vision and guiding principles, are largely positive and hopeful. But how will they be implemented? And are they prioritized? Please explain how essential transit Strategies, especially in section 3, will be implemented.

14. Focus “Right-Sizing” on Multimodal Alternatives

Thank you for recognizing the need to right-size. But right-sizing should NOT primarily mean “add a travel lane to the streets and highways anticipated to be congested by 2045” That’s your very first paragraph on page 82, making it look as if that is the goal of right-sizing.

If you’re going to right-size “to reflect Michigan’s current and future needs and budgets,” you’re going to need to focus more on eliminating or downsizing roads to acknowledge that Michigan is not growing and that we can’t afford to maintain the road system we have today. While people may prefer to never be delayed by traffic, the people of Michigan overall are not willing to pay for that. They can and must accept a certain amount of traffic delay as reality. MDOT must stop expanding roads to strive for some mythical concept of no delays – it’s not realistic, it’s not affordable (\$686 million!?), and it’s not necessary. Give people alternatives instead.

TRU opposes “new lanes” and “lane and shoulder widening” since the very minor demand for additional capacity is far outpaced by the need for expanded transit, rail, and active transportation.

15. Prioritize pedestrian safety OVER road speed or capacity.

Similarly to transit, this plan says many wonderful things about the importance of pedestrian and bicycle safety and “low stress” feature. But how will you actually implement it?

You can’t count on education campaigns, technology, lane markings, or signs to prevent road deaths, not when road design encourages people to drive at unsafe speeds. Safety should focus on road design and accept that slow is much safer than fast. Slowing streets and creating protected spaces for multiple modes is essential.

- a. Road deaths are closely correlated to driver speed which is closely correlated to road design. As you work Toward Zero Deaths, please **emphasize road design that slows traffic** as a critical way to improve safety. (page 95-96)
- b. While I’m glad MDOT plans to “educate staff across all regions to effectively implement designs like road diets and to address the policy barriers that inhibit broader adoption of these tools.” But what comes next? How will you ensure it moves beyond education and into implementation? (page 89)
- c. Page 85 explains your criteria for candidates for right-sizing, including where “volume-to-capacity ratio is less than 0.2... at peak period.” Then you note that arterials can be “inhospitable environments to biking and crossing the road” and that “reducing lanes

saves long-term costs and better balances the safety and needs of all users.” Why limit it to 0.2? I recommend that **if an arterial is unsafe and inhospitable**, but it peaks any less than 0.5 v-c ratio, **it should be a candidate for a road diet** to make it a more complete street for all users. Please reconsider your criteria ratio.

- d. Page 98 notes that “MDOT, in partnership with the public transit agencies and local jurisdictions, should work together to ensure that proper bike and pedestrian infrastructure is provided to allow access to transit stops.” Why “should”? This is your long-range plan. Please commit to doing this!

Addition concerns and recommendations, from each section in page order:

16. Page 9 spotlights the Q-Line in Detroit as one of Michigan’s “innovative forward-thinking projects,” despite the fact that it is poorly designed, underfunded, and has consistently struggled with low ridership. A truly innovative forward-thinking project would have **put the needs of transit riders for reliable frequent service first**, before the wishes of wealthy business owners who wanted an “attractive downtown circulator” to boost property values.
17. Page 20 – Please **include e-bikes** in your discussion of Innovation and Technology, as they make it easier to travel longer distances by bicycle.
18. Page 26 – The “**unmet needs**” of transit **should include** funding projected to be needed in **regional transportation plans**, like the Regional Transit Authority of Southeast Michigan’s Regional Transit Master Plan that was formally approved in 2016. It should also include the **costs to provide universal paratransit service** throughout the state of Michigan, as no one should be left completely without access to doctors or other resources.
19. Page 31 should note that **all the Guiding Principles are of equal value**. Past MDOT actions have given the perception that you focus almost exclusively on Preservation of the existing network for predictable access, with minimal true emphasis on “the public’s demand for more modal choice” or “safe and convenient movement for all people regardless of age, income, race, or ability.”
20. Page 47 should add discussion of how **rail service to northern Michigan could boost visitor numbers** by enabling families without cars to visit and by easing the drive from being a major point of stress for many travelers. It could also decrease peak demand on northbound highways like summer Fridays on I-75.
21. Page 50 explains several ways to “**increase transportation equity**.” The report should do more than state theoretical examples, it **should commit to implementing them**.
 - a. Additionally, within that list, “continue to fund transit vehicle replacements and diesel retrofits to reduce emissions in developed areas” sounds like just more of the same – that should be substantively expanded.
22. Please also explain the difference between the Performance Measures on pages 57-58 (table 2) and those on page 59 (table 3). **What specifically will MDOT be measuring** and holding itself accountable for over the next 24 years?
23. Similarly, page 65 discusses highway travel time reliability and page 67 discusses truck travel reliability. Where is **passenger rail or transit reliability**? Those **need to be explicitly added**.
 - a. Additionally, page 65 explains that MDOT measures reliability as 80th percentile travel time remains close to average travel time. How does that relate to speed limits set to

- improve safety? Do roads still get positive marks for reliability if most drivers are reliably going way over the safe speed limit?
24. **When you mean just roads and bridges, please say just roads and bridges.** If you say “Michigan’s transportation system” or “Network,” you should be referring to the entire transportation system.
 - a. On page 72, the first section is Scale of Need and states “Over the next 25 years, the cost of preserving Michigan’s transportation system amounts to \$111.1 billion.” But four sentences later it mentions that that figure does not include “modal preservation,” which I assume means anything other than roads. Similarly, the chart on the same page is titled, “Network and System Preservation Needs” but only refers to pavement and bridges. That is misleading, as there are enormous rail, transit, and active transportation needs that are completely ignored.
 - a. If quantifying modal preservation and maintenance costs requires concerted partnerships, then do it. Or at least explain when and how you plan to do it.
 - b. Similarly on page 82, the chart is titled “25-year network capacity/right-sizing needs,” but the second paragraph of text explains that “MDOT can only calculate the investment needed to add a travel lane to the streets and highways anticipated to be congested in 2045.” So that chart sorely incomplete and badly mistitled. Please correct the title to state that it is only referring to perceived road-widening “needs.”
 - c. And when does MDOT expect to be able to “calculate the full needs and corresponding costs of right-sizing those pieces of the transportation system”? Please work with the RTA and other transit planners to develop those quickly.
 - d. Same on page 90 – “25-year Transportation Safety and Security Needs” should specify “for MDOT roads”
 - e. Same on page 100.
 - f. Again in the 2045 Strategies section, it is often unclear whether these refer to the road network or the full transportation system, particularly on page 122 sections 2.2, 2.3 ,and 3.1. Beyond age of buses, how will MDOT “invest in data, data collection, analytics, and information systems” for public transit and active transportation? How will you “leverage technology to optimize operations to improve travel time reliability” for public transit?
 25. On page 91, please add **dedicated transit lanes** to Investment Needs – Transportation Safety and Security – Transit.
 26. Page 104 rightly explains ways for transit to move more efficiently, including dedicated right-of-way, pocket lanes, transit signal priority, and tap-to-pay farecards. What is MDOT doing to expand use of these important strategies? The MDOT Office of Passenger Transportation should be actively promoting these strategies and providing pro-active support to local municipalities and agencies to implement them.
 27. Page 105 explains that making “flexible, demand-response paratransit services work better” will “result in shorter waits and fewer missed rides.” It then notes that MDOT’s OPT “is especially well positioned to facilitate the update and adoption of these upgrades.” Well, will it do so? This is MDOT’s plan – please commit to doing so promptly!
 28. Page 113 notes that “Some rural and urban Michiganders are not currently served by high-quality transit.” How many? Please add that into your Performance Measures.

29. The **Adopted 2045 Strategies** starting on page 121, like the vision and guiding principles, are largely positive and hopeful. But how will they be implemented? And are they prioritized? Please explain how all nearly 100 different Strategies will be effectively balanced given limited resources.
- a. Strategies 2.2, 2.3, and 3.1 – Do these address roads specifically or the entire transportation network?
 - b. 3.1 – Improving the **reliability of transit** is vitally important. Please prioritize development of **traffic signal priority for public transit** along corridors like Woodward, Michigan, and Gratiot. I've heard for at least five years that MDOT has been talking with SMART and QLINE about traffic signal priority on Woodward, yet nothing has happened.
 - c. 3.2 – After you "Access mobility needs to develop an appropriate mix of transportation options," then what? How will MDOT expand mobility options for low-income persons, and persons of all abilities? I urge MDOT to complete the assessment within 12 months then develop a specific plan to expand those options by 2024.
 - d. 3.2 – HOW will you "expand equitable access" and "encourage and support integration of land use and transportation policies"? These are great concepts, but without details, timelines, and metrics, they're nearly meaningless.
 - e. 3.3 and 3.4 also sound great. Will you fund them? Will MDOT prioritize funds to implement a MaaS platform or increase use of the passenger transportation system?
 - f. 3.5 – Please provide details on specifically how you will "incorporate accessibility and equity into project selection criteria and consider equity when making transportation and investment decisions." Will they have equal consideration as traffic congestions or level of service?
 - g. 3.5 – Why is "utilize complete streets principles" limited to only "where feasible"?
 - h. 4.1 – HOW will you "reduce the proportion of single occupancy passenger vehicle trips"? What is your implementation plan to "enable alternatives modes of travel that are convenient, comfortable, and affordable"?
 - i. 4.4 – Why only "encourage" "equitable expansion of a connected active transportation network? That should be a commitment and a concrete Performance Measure.
 - j. 5.1 – Please make it very clear that "Address risks to Michigan's transportation network" includes people who don't drive, including people with disabilities and low-income families.
 - k. 7.1 – Please make it very clear that CAV adoption must fully ensure safety of pedestrians and other vulnerable road users.
 - l. 8.2 – Why only "Participate" in "transit-oriented development projects"? That's weak. MDOT should at least "support," if not "promote."

Skepticism due to previous plans including pretty words and no impact

As noted at the beginning, the vision, principles, and strategies laid out in this proposed plan are beautiful. However, past plans have said the same and achieved little.

Michigan's 2040 transportation plan envisioned "a safe, efficient, resilient and integrated multimodal system" and listed Choice as its very first value, stating, "The transportation system in 2040 will respond to the public's demand for more transit and nonmotorized choices." Where do Michiganders have more transit choices today than five years ago? While a nice addition, the QLINE has been shut down for 18 months and provided no greater access when it was running than the prior buses had.

The vision and values may emphasize multimodal choice, the performance measures show MDOT's real priorities. The 2040 plan committed to:

- Improve: 85-95% of bridges in good or fair condition
- Improve: 90% of pavement in fair or better condition

But it never even tried to improve on transit, striving only to:

- Preserve existing intercity passenger rail, intercity bus, and local bus service.

Please explain how this plan will be different.



Transportation Riders United is a Detroit-based nonprofit organization that has been working since 1999 to ensure everyone can get where they need to go, regardless of whether they drive. Through education, mobilization, and advocacy and diverse partnerships across the state, we push for more and better public transportation and other sustainable mobility options.