

Dear Michigan Department of Transportation,

We at Transportation Riders United appreciate the opportunity to contribute our comments and recommendations on the Michigan Mobility 2050 plan. We applaud this plan's values, acknowledgment of climate goals, and focus on multimodal transportation and providing transportation options for all, which are meaningful and create a foundation for a future toward accessible and reliable transportation for all Michigan residents.

The plan, however, has inconsistencies that urgently **need to be addressed**.

- 1) This plan presents an extremely compelling Vision and Guiding Principles. Yet it fails to explain how MDOT funding and project selection decisions are guided by these principles.
- 2) **Safety** is listed as the **top priority**, yet road deaths have not improved over the past 5 years and this plan has **no clear data-driven action plan** to bring down road deaths.
- 3) This is framed as a plan for all modes, yet there are **huge gaps in data on non-road topics** and this plan fails to explain how those gaps will be addressed.

While the following pages provide more details, we'd like to emphasize the following recommendations as priorities:

- 1) **Update project selection criteria:** MDOT must explicitly show how the plan's values and goals directly impact which projects receive funding. Project selection needs to be updated to transparently incorporate quantifiable criteria based on stated values like safety, equity, access, and climate.
- 2) **Detail the implementation plan:** The plan should explain the implementation process in more depth, clearly defining who is responsible for achieving each goal, and what are top priorities for MDOT.
- 3) **Incorporate meaningful metrics** for improving public transit, bicycle and pedestrian access, and reliability, especially around whether Michiganders have access to transit and trails.
- 4) Articulate an **action and funding plan** to meet Michigan's commitment **to reach carbon neutrality by 2050**. The MI Healthy Climate Plan is referenced several times; its time for MDOT to develop an action plan to achieve its commitments.
- 5) Adopt a **"fix-it-first"** commitment to **fund safety, mobility, and road maintenance** before allocating any state or federal funds to widening any highways, including "flex lanes."

We recognize the amount of complexity, time, and effort this work requires and look forward to seeing an updated version of MM2050 that is more transparent and details how MDOT is crafting a sustainable and equitable future of mobility. Thank you for your attention to our recommendations and detailed comments below.

Megan Owens, Executive Director
On behalf of Transportation Riders United

Detailed comments:

1. Service for all modalities

One of MM2050's top strengths is that it acknowledges that transportation goes beyond MDOT's infrastructure and explicitly states its intention for this to be an all-modes plan for all people.

Thank you for this focus. However, for this vision to come to fruition, there must be more data and investment in the non-road aspects of transportation.

- We appreciate the statement on Page 3 that the intended impact of MM2050, stating, "... the plan informs transportation stakeholders, elected officials, and the public of investment priorities, needs and trends that will affect Michigan."
 - This topic should be brought up again more explicitly in the Implementation and Next Steps section with specific action items.
- Page 6 provides an aspirational vision of a mobility network that is an "interconnected multimodal system, people focused, equitable, reliable, convenient for all users and enriches Michigan's economic and societal vitality." We strongly applaud this.
 - Yet most of the data to reach these outcomes are not being measured. Please provide a plan and timeline for gathering the data and following the metrics that demonstrate whether you're achieving that. For example, there is no way to know whether the system is reliable if transit access and reliability metrics are not being defined and collected.
 - The plan fails to map out how we're going to achieve this vision, as many people-focused and multimodal elements that are required to achieve this outcome are missing from the draft.
- We also applaud the page 8, Mobility goal: "Enhance mobility choices for all users of the transportation network through efficient and effective operations and reliable multimodal opportunities"
 - Please provide specific strategies and funding priorities of HOW MDOT will "Improve access and connectivity between modes" and to "Provide accessible and equitable modal options for the movement of people"
- Thank you for clearly showing on page 10 that "... each mode of transportation is at a different point on the journey."
 - Yet there does not appear to be any particular focus or prioritization on ways MDOT plans to boost up the modes that are lagging behind.

2. Metrics and System Tracking

Despite the plan stating explicit equity and multimodal goals, the necessary data and internal system tracking measures to reach these goals are not included in this plan, nor is there any stated plan to begin to collect this information.

Many non-road projects and plans **lack clear, meaningful metrics**. For example, while **Title IV of the Civil Rights Act** acknowledges nine categories of people with transportation needs and challenges, there are no tools to measure their transportation-related circumstances and outcomes, and no clear plans to address those needs. **MDOT needs to gather and use data to inform decision-making**. We urge MDOT to **add additional metrics related to transit**

availability and reliability, among other areas, to better understand whether the accessibility and reliability of these transit systems are being met.

- Table 4 on page 19 has a useful table on safety metrics, and we appreciate that this is a metric that is actively being tracked.
 - However, the outcomes are not changing significantly, and annual fatalities increased from 2020 to 2024. What is the plan to fix this? What is MDOT changing to meaningfully improve road safety?
 - This statistic seems to undermine the core premise that we don't need major changes from MM2045. Clearly what we've been doing has NOT been working to meaningfully improve safety.
 - The 1st safety strategy on page 57 should be to design safer roads
 - There needs to be increased metrics on safety for active transportation
- Table 6 on page 20 on congestion metrics is useful: the data clearly shows that congestion is not a major issue. Why do we prioritize it over increased safety and access?
 - Page 37 states, "In many situations, transportation agencies cannot simply build their way out of congestion, nor would it be feasible to do so from a financial or practical perspective." Given the minor amounts of congestion and the enormous other needs, why is any state money going into road widenings?
- Figure 22 on page 39 has the potential to be a meaningful graphic but needs more explanation of what it is meant to convey and how this plan will improve job access for non-drivers.
- Page 22's system reliability metrics need to be updated to include additional metrics in public and active transportation, such as:
 - On-time performance for public transit
 - Number or percentage of people who have access to transit
 - Number or percentage of people who have access to transit 7 days a week
 - Percentage of jobs most Michiganders can access within 60 minutes on transit, biking, or walking
- Page 27 references environmental resilience and the impacts of extreme weather. We expect to see the necessary metrics, tracking, and community outreach strategies in the upcoming resilience improvement plan.
- Page 28 references a comprehensive description of people with transportation needs and challenges. The plan needs to have the appropriate metrics to properly begin the process of supporting these identified groups.
 - MDOT needs to articulate what partnerships are needed to adequately support the identified groups and identify within the plan who those partners are.
 - There also needs to be an inclusion of whether funding will be allocated towards collecting the additional data stated on page 29 (crash, transit availability, and health), and this data will affect future decision-making.
- When categorizing right-sizing & system capacity, expansion and widening need to be listed, tracked, and made separate from road diets and lane reductions. Those are very different purposes and should not be conflated.

- Forecasting of needs beyond roads on pages 50-51 is very unclear and needs to be updated to describe how revenue needs and gaps are defined, especially given the acknowledgement throughout the report that transit and rail are lacking.

3. Project Prioritization, Transparency, and Decision-making

MDOT is tasked with making decisions and implementing projects that affect the lives of all Michiganders. Yet few Michiganders have any idea what goes into these decisions. This plan fails to explain how decisions are made, what values and data are used in those decisions, or who is responsible for those decisions.

MDOT needs to update the project selection process to transparently include stated values of safety, equity, access, and climate. The plan needs to explain in more detail the implementation process and who is responsible for implementing each goal. Even the chapters on long-term goals are vague about how the plan's values and goals influence decisions and which projects get funded. MDOT should update the plan to incorporate more transparent, quantifiable project selection criteria and include a detailed implementation plan.

- We applaud the objectives on page 8 under the partnership goal: "Use performance measurement to inform decision-making..." and "Strengthen community engagement and open decision-making processes offered through a combination of inclusive traditional and innovative methods"
 - Please clearly communicate how this is occurring and how enhanced data-availability can enable more transparent, performance-driven decision-making.
- Page 13, "Michigan's population is forecast to grow slightly..."
 - If our population is not significantly growing, why is there significant investment in road widening?
- Page 27 states, "This plan serves as the action plan for the state of Michigan to reduce greenhouse gas emissions and transition toward economy-wide carbon neutrality."
 - Yet this plan fails to commit to any action plans, let alone meeting the MI Healthy Climate goal of "expanding clean transportation, including public transit, by 15% a year." Please explain how MDOT plans to achieve that.
- Page 57 (1.2) states, "Integrate intelligent tools to analyze and quantify safety impacts and implement cost-effective, data-informed targeted and systemic safety countermeasures and mitigation strategies."
 - Please provide more detail about how this is being accomplished. We know public education is not an impactful safety countermeasure. Why is it the first strategy?
- Page 59: "Incorporate accessibility and equity into project selection criteria and consider equity when making transportation and investment decisions."
 - Include what the process is to get this done. What decisions need to be made, how can disadvantaged communities be involved in them, and who makes them?
- On page 63, we appreciate the recognition that Implementation actions need to start with Resource Allocation and must clearly include Funding Strategies and Project

Prioritization and Decision-Making. Yet nowhere in this chapter are implementation actions described that alter Resource Allocation or Project Prioritization.

- Page 63 states, “The implementation plan will advance MM2050 policies through near-, mid-, and long-term strategies, focusing first on the most critical to meet MM2050 goals and objectives.” What actions in the next steps are the most critical? How is this decided?
- In fact, Chapter 9 is supposed to be about Implementation and Next Steps, yet seems to mostly list studies and projects that are already done or underway. That does not explain how any of the strategies will be implemented.
 - In the final plan, please differentiate between “accomplishments,” ongoing activities, and proposed implementation actions that will help achieve the plan’s goals, instead of blurring the three in a massive list of unorganized stuff.
 - Page 67 references the MI Healthy Climate Plan; include what the action steps are in relation to reaching transportation climate goals.

Conclusion

MDOT plays a critical role in the future of transportation access in Michigan, which affects every facet of a person’s life, including whether they can get to work, access food, receive medical care, or see loved ones. We enormously appreciate the efforts of everyone at MDOT. Yet we fail to see how this plan will meaningfully improve Michiganders access and quality of life, not without more multi-modal metrics, clearer values-driven decision-making, a commitment to stop widenings, and clear implementation steps.

Consider the policy recommendations we’ve provided as opportunities to truly embrace and bring to life the visionary goals of MM2050. We look forward to seeing changes added to the final version of the long-range plan.