



MINNESOTA

2020-2024 STRATEGIC HIGHWAY SAFETY PLAN

JULY 2020

MINNESOTA SHSP RESPONSE TO COMMENTS



Strategic Highway Safety Plan Response to Comments

The Minnesota Department of Transportation released the draft 20-Year Minnesota Strategic Highway Safety Plan for formal public review on February 19th, 2020. The public comment period ended on March 20th. During the public comment period, the SHSP received 29 comments from individuals or organizations. This document summarizes the comments received through this process and provides MnDOT's responses to each point of feedback, where applicable.

Summary of Changes Made to Plan

General Changes

- Spelled out acronyms that have not been referenced before and removed acronyms that are only used once in the document.
- Throughout the document, made small text changes to clarify or re-word sentences. Changes did not change the meaning of sentences.
- On page 4, added, "In addition to the emotional impacts" to the sentence on the cost of crashes. Sentence now states, "In addition to the emotional impacts, these deaths and injuries cost Minnesotans over \$3.6 billion across five years."
- On page 9, removed Inattentive Driving from the trending down category and added to footnote, "and is under-reported in crash reports and therefore not included in Figure 8."
- On page 27, added "regional" to text. New sentence states, "The SHSP strategies and tactics were informed by several plans and in turn are intended to inform state, regional, local, organization and coalition plans at their next update."

Changes to Tactics

- Removed Montana from Traffic Safety Culture tactic on page 13.
- On page 14, tactic 2.3 now states, "Support legislation that would update distracted driving penalties for crashes involving serious injury or death."
- On page 14, added "including in interactions with people walking, rolling, and bicycling" to tactic T3.4 which now states, "Support the transition to autonomous vehicles and other emerging motor vehicle technology to reduce human error, including in interactions with people walking, rolling, or bicycling."
- On page 16, tactic T4.4 now states, "Identify alternative sources of funding for counties interested in establishing DWI post-conviction Victim Impact Panels."
- On page 16, tactic T4.5 now states, "Identify alternative sources of funding to establish more DWI Courts."
- On page 17, tactic T2.1 now states, "Prioritize transit, bicyclists, and pedestrians in intersection design. Provide facilities to accommodate people walking, rolling, and bicycling to limit conflicts with vehicles."
- On page 17, moved tactic T4.4 "Explore the potential for automated red-light enforcement cameras in Minnesota by researching its effectiveness in states that have implemented it" from Years 3-5 timeframe to Years 1-2 and edited tactic to now state, "Explore the potential for automated red-light enforcement in Minnesota by researching its effectiveness in states that have implemented it and any technical, legal, privacy, and equity barriers."
- On page 18, changed "Increase" to "Use innovative" for Tactic T1.2 which now states, "Use innovative media messaging to spread awareness that unsafe speed kills."
- On page 18, deleted Tactic 2.2 "Utilize speed camera-assisted enforcement as appropriate. Place signs in areas with the speed cameras to notify drivers of their presence." Speeding is not a priority for camera-assisted enforcement. Camera-assisted enforcement tactics remain in the intersections and work zones focus areas.
- On page 18, added "and any technical, legal, privacy, and equity barriers" to tactic T2.3 which now states, "Explore the potential for automated speed enforcement cameras in Minnesota by researching its effectiveness in states that have implemented it and any technical, legal, privacy, and equity barriers."

- On page 18, added “based on land use” and “Performance Based Practical Design” to T3.1. The tactic now states “Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds based on land use. Use road diets where appropriate.”
- On page 20, tactic T2.3 now states, “Encourage use of discretionary OTS provided traffic safety enforcement funding for localized seat belt saturation enforcement that targets known high risk locations and time periods.”
- On page 22, added “and curb ramps” and “or rolling” to tactic T2.1 which now states, “Expedite maintenance of sidewalks and curb ramps to deter people from walking or rolling in the road.”
- On page 22, added “Based on land use” to T2.3. Tactic now states, “Based on land use, design roads and facilities for pedestrians, such as sidewalks, mid-block breaks, and bump outs.”
- On page 22, added tactic T3.3 “Explore school bus stop arm violation camera enforcement.”
- On page 22, added “at regional” to tactic T3.4 which now states, “Develop pedestrian plans and Complete Streets plans at regional and local levels.”
- On page 22, added “near transit stops” to tactic T2.6 which now states, “Improve lighting around pedestrian facilities to increase pedestrian visibility, including near transit stops and in rural areas.”
- On page 23, added footnote which states, “The Minnesota Driver’s Manual is currently translated into Spanish in addition to English.”
- On page 24, replace “possibly with decoy squad cars” with “using innovative techniques” for Tactic 1.2 which now states, “Increase visible law enforcement presence using innovative techniques. Increase funding for additional law enforcement resources.”
- On page 25, removed tactic 1.4, “Require agriculture trucks to follow commercial vehicle inspection requirements.”

Plan Comments

ID	Source	Name	Comment	Response	Change to Document
1	Web	Jackson Hurst	I approve of the safety plan	Thank you for your comment.	No change
2	Web	Chris Smith	Consider adding wildlife-vehicle collisions (WVCs) as a focal area as they comprise over 10% of all fatalities and serious injuries between 2014-2018. On rural roads that figure is higher. Minnesota also ranks in the top 10 states for deer-vehicle collisions.	Based on Minnesota Crash Facts for 2014-2018, wildlife-vehicle collisions were 1.5% of fatal crashes and 1.2% of any injury crash. The new MnCRASH data system will have better wildlife data. MnDOT will evaluate with multiple years of new crash data.	No change
3	Web	Daniel Waters	<p>Please review how to determine a safe on-ramp to freeway length. For example, a 600 ft ramp from S Lexington to S 35W isn't just inadequate - it's very dangerous. In my opinion, the ramp should be closed except for morning rush hour when the lights can sequence vehicles entering the freeway.</p> <p>In Blaine, the on-ramp from Lexington Ave. South to Hwy 35W South exceeds the acceptable length by 20 feet. The ramp is 600 ft. long while the acceptable minimum length is 580 ft. The current ramp was constructed when the Lexington bridge was only two lanes. Today it is eight lanes wide and carries several times more traffic.</p> <p>A specific problem happens when the lights near the bottom of the ramp are yellow. From both northbound Lexington and southbound Lexington there are two lanes of traffic which are expected to merge while driving down the on-ramp before cars enter the freeway.</p> <p>What happens is that:</p> <ol style="list-style-type: none"> 1) the two lanes on top, 2) plus the requirement to merge before the freeway, 3) plus the short ramp length of only 600 ft, 4) plus the speed of traffic on the freeway outside of rush hours being between 70 mph and 80 mph, 5) plus not having any visibility as to what vehicles are approaching because the bridge is so close to the merge point, sets up a requirement by each driver to race down the ramp - not for the sake of being first - but for the sake of being safe! They are safer being first because they need to go from 0 to 75 mph in a very short distance with no visibility as to what vehicles are approaching in the right lane of the freeway. Many 	<p>Thank you for your comment.</p> <p>The SHSP is not a project-specific plan. This comment will be shared with relevant MnDOT District staff.</p>	No change

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			<p>cars use the shoulder for another several hundred feet to get up to a speed where they can merge safely.</p> <p>I'm tired of racing down that ramp and a few years ago decided to stop using it. The on-ramp at 95th Avenue S to 35W S is a very good example of what should also exist at Lexington.</p> <p>Thank you! Dan Waters</p>		
4	Web	Kenneth Harden	<p>I do NOT support any automated systems to issue citations and/or collect fines under any circumstance. I only support these actions being taken by a police officer or other law officer who is observing the offence and making a traffic stop to cite the driver. If these automated systems are proposed I would want to see the entire Toward Zero Death program suspended in its entirety.</p>	<p>The SHSP and the TZD program take a comprehensive approach to traffic safety in Minnesota.</p> <p>The plan is developed in coordination with DPS, MDH, and MnDOT. That is why the SHSP includes a strategy to research the effectiveness of automated enforcement for speeding in work and school zones, and for red light running.</p> <p>The plan also includes strategies for camera-assisted enforcement which uses cameras to aid officers in enforcement.</p>	No change
5	Web	Earl Faulkner Sr	<p>Why isn't there active enforcement of the new MN law which is supposed to keep slower drivers out of the left lane unless passing another vehicle??</p> <p>MNDOT and public service announcements should re-educate drivers on proper merging at freeway cloverleaves. It's very simple, but no agency talks to the driving public about it: vehicles merging out of a cloverleaf need to be accelerating; vehicles entering a clover leaf must be slowing. Obviously, the vehicle slowing should fall in "behind" the vehicle accelerating. The sequence described here, rarely occurs.</p> <p>The driving public should be educated to use the "on ramp" onto a freeway as an accelerating lane whenever possible. The closer a merging vehicle's speed is to the speed of traffic being merged into, the safer the merge.</p>	<p>The left lane law is not new. The language was simply updated. Law enforcement takes action when it is appropriate. These behaviors result in very few crashes. Education is a large component of the TZD program. MnDOT has led education campaigns on many aspects of driver behavior including zipper merges. MnDOT evaluates interchange designs, where possible, to</p>	No change

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			<p>Enforcement officers should stop offenders and issue, not a ticket, but a verbal explanation along with an information card on these details. Public service announcements should be broadcast as well.</p> <p>Thank you.</p>	<p>improve mobility and safety. For your last point, the TZD program has developed an information card to use to educate motorists on new laws and driver expectations.</p>	
6	Web	Lisa Wichman	<p>The Dept of Transportation seems to spend a lot of time and effort on studies, surveys, and putting together very pretty reports and presentations. No where do I find how they are going to influence law enforcement or bodies of authority to enforce the laws we already have in place. If we are truly facing billions of dollars in surplus, why aren't you at the legislature begging for this money to ramp up programs and add traffic law enforcement? I live in Blaine. As you know, Highway 65 has been overlooked for many, many years. It's known as "DEATH ALLEY" in my neighborhood. It's avoided at all costs. Residential areas have become secondary highways - my road is called "Highway 99th" now. It used to be a quiet neighborhood, now we have rush hour traffic 24-7 going through our neighborhoods to avoid 65 and it's only getting worse. SPEND OUR SURPLUS ON ACTUAL BRIDGES AND OVERPASSES. THE 4 SUGGESTED BAND-AID SOLUTIONS ARE A COMPLETE JOKE! SPEND THE MONEY AND INVEST IN LONG TERM FIXES!! It's our tax dollars, spend it right the first time or give it back. Bring back "red light" cameras. Look at the statistic of crashes on 65 and 99th, 109th, 117th, all the way north. I can guarantee you that most to all crashes are due to running red lights or cell phone talkers. It's completely bogus that it's a violation of our privacy rights (or whatever the excuse was to shut this program down). Baloney! Driving is a privilege, not a right. Don't break the law and you won't have to worry about a photo of your license plate and violating your "right to privacy".</p> <p>We could also use tougher fines/penalties inattentive drivers. The "hands free" law has only made a tiny dent in catching violators. I suggest: 1st offense - \$1000 fine, lose license until you see a judge, then pay to take a class so you can watch videos with testimony from family survivors on how inattentive driving has changed their lives forever. Then you have to take your written and road test and pass at a higher standard. 2nd offense - \$10,000 fine, lose your license for a year, then see a judge, do the classes and take your tests again at an even higher standard. 3rd time - 3 strikes your out. If you drive without a license - jail for 5 years, etc. You get my point. I see violators multiple times a day, every single day. Because I abide by the laws, I am unable to report violators while driving. By the time I can safely stop, they are long gone of course. People just don't give a crap as they know the consequences are next to nothing.</p>	<p>The Highway 65 corridor is currently undergoing a safety and mobility corridor study to determine future improvements on the corridor. Comments specific to that corridor can be given as part of that process.</p> <p>The SHSP also includes a strategy to explore the potential for red light running enforcement cameras.</p> <p>Inattentive driving is a core focus area of the plan. The SHSP includes multiple strategies to address penalties for inattentive drivers.</p>	No change

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			Thank you for the opportunity to voice my concerns.		
7	Web	Dennis Maciej	<p>My primary concern is with inattentive drivers and the lack of accountability for the offender. I certainly agree with the strategies outlined including increased education to all drivers, more enforcement, and reduced leniency in sentencing. I would like to see immediate restrictions of driving privileges when offenders cause injuries and property damage. My experience involves my son who is the victim of a delinquent distracted driver. Nearly four months after the incident, 3 spent in the hospital, he is still unable to walk or do basic functions. Following many surgeries he is prescribed many different pain meds used daily and is still facing future surgeries. The medical bills are in the millions of dollars, plus the loss of wages and ongoing pain and suffering. All this while the offender goes on with his daily routine as if nothing happened. He was cited for failure to yield right of way which is viewed as a petty offense. Law enforcement and courts are more concerned with protecting a juvenile offender than aiding the victim of the offense. A major life changing event for my son and his family is certainly no petty offense.</p>	<p>Thank you for your comment. Inattentive driving is a core focus area of this plan. The SHSP includes multiple strategies that are in-line with your suggestions including T2.2 - Encourage judges to reduce leniency in sentencing distracted driving offenders and T2.3 - Update penalties for distracted driving violations that result in death and serious injury. In addition, the new hands-free law should reduce crashes related to inattentive driving.</p>	<p>On page 14, tactic 2.3 now states, "Support legislation that would update distracted driving penalties for crashes involving serious injury or death."</p>
8	Web	Shawn Schloesser	<p>Pg 13. Traffic Safety Culture: What is the benefit of Minnesota participating in the Montana traffic safety culture pooled fund study? Did you mean Minnesota's traffic safety culture pooled fund study?</p> <p>Pg 23, Increase Public Awareness to Improve the Safety of Young Drivers: Why translate the drivers manual into Russian rather than Spanish or any of the multiple African languages?</p> <p>General overview, no need to include all the acronyms if they are not used e.g. POLD. Suggest not using acronyms unless they are explained on the same page to ease reading.</p>	<p>The Traffic Safety Culture is referencing Minnesota's traffic safety culture pooled fund study. The University of Montana administers the program. This will be clarified in the text.</p> <p>The Minnesota driver's manual is currently translated into Spanish. The tactic already suggests translating the driver's manual to Somali, Hmong, and Vietnamese.</p>	<p>Removed Montana from Traffic Safety Culture tactic on page 13. Removed acronyms that are only used once in the document.</p> <p>On page 23, added footnote which states, "The Minnesota Driver's Manual is currently translated into Spanish in addition to English."</p>
9	Web	Daniel Bunde	<p>Good afternoon, My idea isn't new, I have tried to push this idea before through Retired State Rep, Tony Cornish, with limited success. I'm going on my 22nd year in Law Enforcement and have had many driving complaint calls for service. These driving complaints can be anything from a drunk driver to some sort of medical issue. Many times we are unable to locate the subject vehicle or the vehicle is located due to a</p>	<p>Thank you for your comment. There are significant privacy challenges with this as well as capacity within the driver's</p>	<p>No change</p>

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			crash. If the state licensing required a phone number attached to your D.L., it would give us another tool to get the driver stopped and off the road. Example, My brother left the City of Lake Crystal heading towards Mankato. He was recovering from surgery and on a prescription pain killer. On the way to Mankato he had at least three motorists report that he was all over the road. He wasn't located. On his return trip back there was another report on his bad driving. As he entered the City of Lake Crystal, his vehicle left the roadway flipping over the guardrail and come to rest in the lake. My brother survived. If there would have been a contact number, he could have been called by an officer and ordered to pull off to the side of the road until he was cleared. If there was a spot on the form to add it but not make it a law, enough people would do it voluntarily. This would help dispatch and officers stop these potential deadly outcomes.	license system to store such data.	
10	Web	Mack Backlund	Have you considered how "traffic calming" has increased the response times of police, fire, EMTs and ambulances? Please reply. Thank you. Mack Backlund	Emergency response times are a consideration at the project level. As part of project development and engagement, MnDOT works with emergency responders to ensure adequate response on our roadway and that roadway design allows for emergency vehicle access.	No change
11	Web	David Otis	I'd like to suggest changes in the wording of the Motorcyclist, Strategy 1, Increase Public Awareness and Education to Improve Motorcycle Safety, to the following; T1.3 Encourage insurance companies to offer incentives for experienced motorcyclists to take the OTS Intermediate Rider Course as refresher training.	Thank you for your comment. It is a worthwhile incentive to explore, but given the time needed to build such a program, we are unable to incorporate into the current SHSP.	No change
12	Web	Jeff Lenz	I would like to submit the following comments: 1) I would like to push to make the 4 E's, 5 E's as Everybody is needed to make TZD work. This is mentioned several times thru-out the document. On page 2 on the right side, that side bar really emphasizes the need for Everyone. 2) On page 9 the graph shows inattentive driving is trending down, so our distracted driving push must be working! 3) On page 13, TSC 2 states to increase coordination between programs in state - I feel we need to be working with other states more closely to see what is working there also. 4) On page 14, T3.3 - I would say this is on-going. At least at MnDOT and I have seen many counties have rumble strip plans and wider striping in their HSIP projects. 5) On page 15, - I would	Thank you for your comments. The TZD group is currently undergoing a re-evaluation of its approach and methods. These comments will be shared with the TZD Leadership Team. Education is a major component of the TZD program and the SHSP action oriented	No change

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			<p>like to see a wider use of the POLD program. I believe not all agencies are using this tool. Also push for more alcohol servers to push for more awareness of overserving which is mentioned, but I think it needs to be pushed harder. 6) On page 20, T1.6 We need to get the teen perspective on driving hazards as well as having teen oriented TZD meetings. Their perspective is critical to changing the upcoming drivers habits. 7) On page 20, T3.2,3 Work with schools, daycare providers, clinics and hospitals on proper child passenger safety seats, to make sure everyone has their car seats in correctly or has proper car seats. 8) On page 24, many of these work zones practices are currently on going at least at MnDOT, however many counties and cities do not require near as much traffic control measures. Push to make all work zones comply to a higher standard. Many good points, some that are just not practical from a design and maintenance perspective. Once again I feel the biggest hurdle to so much of this is education. How do we educate the public on new things. I would like to see mandatory drivers training for ALL individuals every 8 years? Maybe a 4 hour refresher course. Work with insurance companies to make this happen? Almost all vocations have continuing education, but not driving and this needs to change. I am currently in Engineering and Education. I work for MnDOT and teach work zone safety in drivers ed classes.</p>	<p>strategies. The plan is intended for all transportation agencies and the public. A strategy may be on-going for some agencies but not for others. The timeframes for implementation may vary from agency to agency.</p>	
13	E-mail	Brian Kary	<p>Hi Everyone, I have a high level comment about the Strategic Highway Safety Plan. One thing we've heard from FHWA is to incorporate traffic incident management strategies in state strategic highway safety plans. Implementing TIM strategies can save lives and serious injuries by ensuring our emergency responders are safe on the incident scene and by reducing secondary crashes which can sometimes be more severe than the initial crash due to speed differential at the tail end of the queue.</p> <p>The following is a clipping from page 14 of the FHWA Traffic Incident Management Handbook. https://ops.fhwa.dot.gov/eto_tim_pse/publications/timhandbook/tim_handbook.pdf</p>	<p>Traffic incident management strategies are important for improving traffic safety. These strategies would likely fall under the support solutions focus areas which do not have specific strategies in the plan. However, the SHSP and the TZD program support continued implementation of traffic incident management by MnDOT and other transportation agencies.</p>	No change
14	Web	Glen Jacobsen	<p>Strategic plan for motorcycles should NOT be to 'encourage and educate about benefits of helmet use.' We need to return to a Mandatory helmet law for all motorcyclists. Longer term, consider regulations/law regarding other safety apparel, such as shoes/boots, long pants, long sleeves, etc. But we can and should immediately return to a mandatory helmet for all riders, regardless of age, skill, experience, etc.</p> <p>Other states have such laws and the folks that ride here without helmets take one with</p>	<p>Thank you for your comment. The Motorcycle focus area includes tactic T2.3 "Review current legislation to identify opportunities to encourage legislative changes that reduce the risk of harm to motorcycle</p>	No change

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			a wear it where it is required. It is not impossible. It is the single biggest factor in making riding a motorcycle more safe for the riders and passengers.	riders.” This tactic will have an action plan that will include strategies to implement the tactic. We will keep your comment in mind as we develop this action plan and future SHSPs.	
15	Web	Nicole Charles	<p>Lets reduce deaths by funding public transportation- making it totally free for everyone. Increasing routes and frequency. Make public transportation a realistic reliable option for everyone. less cars on the road is safer and better for the environment.</p> <p>Also we desperately need to fund sidewalk maintenance and infrastructure... we need to protect the pedestrians!</p> <p>More bike lines and bike infrastructure. Less people driving should be the number one goal- its the direction that we need to head towards for a sustainable society. infrastructure to support indivual cars is a waste of taxpayers money- it is inefficient, and unsustainable. lets focus on making sound alternatives- most people would love to give up the headache of driving and maintaining a car if there was reliable alternatives.</p> <p>its better for public safety.</p>	<p>Public transportation is mostly funded and operated at the regional level. The SHSP does not have the ability to fund public transportation. However, MnDOT supports additional funding for all modes of transportation in Minnesota.</p> <p>Pedestrians are a strategic focus area in the plan. The SHSP includes multiple strategies for pedestrians including strategy T3.1 Increase funding for pedestrian safety campaigns and pedestrian facilities.</p>	No change
16	Web	Stephen Krenz	I believe that in order to earn a motorcycle endorsement all new motorcycle, scooter and three wheel riders take and successfully complete a Basic Motorcycle class. In addition after successfully completing a Basic Motorcycle class, riders under the age of 21 must ride for six months with no infractions. After the six month period they return to the license station and receive their motorcycle endorsement. Another idea would be that new riders be restricted to 500cc or less engine displacement and a low horsepower machine for a period of time.	Thank you for your input. We will consult with the DPS Motorcycle Safety Training Program and Task Force to explore this as an option.	No change
17	Web	Bill Shaffer	I coordinate the MN Motorcycle Safety Program and had a few comments that I've organized by SHSP tactic number noted in the draft section for Motorcyclists. T1.1 A new updated rider brochure was just done for the 2020 riding season. T1.2 A new updated Sharing the Road brochure was done for 2019. However, we haven't had any new creative concepts on this topic for some years. T1.4 and T1.7 We just completed switching to the Motorcycle Safety Foundation's (MSF) new Basic and Intermediate Rider Courses. MSF curriculum development staff	Thank you for your comment. No response needed.	No change

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			<p>have incorporated both of these tactics into their new curriculum.</p> <p>T3.1 This has been a long standing recommendation of the state's Motorcycle Safety Advisory Task Force, and it's good to see there is interest in implementing it.</p> <p>Thank you for the opportunity to have input into the SHSP.</p>		
18	Web	Will Wlizio	<p>Hello, planners,</p> <p>Thank you for inviting comment on the strategic plan.</p> <p>I'm thankful for many of the priorities you've identified already. These include investment in safety programming for those driving around pedestrians, bicyclists, and other vulnerable users; an emphasis on intersection design, redesign, and community input; and attention to enforcement of and strengthening of the hands-free law. I'm broadly in support of the strategic plan.</p> <p>I'd offer up a few suggestions to change from tactics to prioritized tactics: leading pedestrian intervals, increasing funding for pedestrian infrastructure, and supporting Complete Streets plans. In my experience as a pedestrian, these basics drastically increase my perceived level of safety.</p> <p>Finally, a few other thoughts:</p> <ul style="list-style-type: none"> - Please continue to work toward decreasing the legal BAC. This is a modern society of intelligent humans -- we should be working toward zero tolerance of an alcohol in a motorists system. - Please encourage enforcement of commercial vehicles illegally parked in bicycle and pedestrian facilities. Forcing a bicyclist into a road, for example, creates a hazard that neither the bicyclist nor the other vehicle traffic are expecting, ratcheting up safety concerns. - Right turn on Red should be made illegal. Please study this. When the Bicycle Alliance of Minnesota completed its Great Mn Biking & Walking Survey, it found one of the biggest fears of bicyclists and pedestrians was motorists taking a right turn on red. Other modern countries have long since abandoned this unsafe behavior. Let's lead the way in Minnesota! <p>Thank you for your ongoing dedication to safety on our roadways!</p> <p>Sincerely, Will Wlizio</p>	<p>Pedestrian safety is a strategic focus area of the SHSP with multiple action-oriented strategies. Leading pedestrian intervals and increasing funding for pedestrian infrastructure are tactics for Years 1-2.</p> <p>Legal BAC levels are currently being examined on a national level and we will monitor the discussions and the data.</p> <p>Decisions on right turn on red prohibitions are currently made on a case-by-case basis at the project level.</p> <p>Enforcement is an important component of the plan.</p> <p>Enforcement of parking restrictions is handled by various jurisdictions throughout the state.</p>	No change
19	Web	Liz Walton	<p>Please consider at least one reference that it is POSSIBLE to achieve zero (both Oslo and Helsinki have achieved zero). MN should challenge itself to be the first in the US to achieve zero. Consider reviewing the Oslo/Helsinki plans to see if there is anything MN should identify as policies/strategies to consider in near and long term----maybe reviewing the plans is a new bullet.</p> <p>Please consider at least a brief/better reference to sustainability/climate</p>	<p>The plan emphasizes that 0 fatalities is the ultimate goal of TZD in the State of Minnesota. The SHSP is an important step towards achieving that goal. MnDOT coordinates its efforts through statewide plans</p>	<p>On page 17, tactic T2.1 now states, "Prioritize transit, bicyclists, and pedestrians in intersection design. Provide facilities to</p>

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			<p>crisis/reducing motor vehicle use and partnerships within key MnDOT offices and other state offices (DPS, Health, etc). Motorized vehicles on state highways typically travel at high speed--and speed is what kills (see EXHIBIT 2-1: Operating Speed and Crash Severity in the MnDOT Bike Design Manual; http://www.dot.state.mn.us/bike/bicycle-facility-design-manual.html). The Highway Safety Plan must be strongly tied to work in other areas within MnDOT, such as the STAC (http://www.dot.state.mn.us/sustainability/advisory-council.html).</p> <p>Please highlight throughout the need to support and prioritize the most vulnerable, particularly because the FAST analysis (pg 32) requires applying special rules. Some Core elements (pg 11) can directly improve vulnerable user safety (intersections, speed, inattentive).</p> <p>Not sure where it's best to include, but it would be very helpful to note briefly that any references to rumble strips, etc. must not degrade conditions for vulnerable users (people walking on roads where no walks exist/people on bicycles along MnDOT's State Bicycle Route Network (http://www.dot.state.mn.us/bike/district-bicycle-plans.html). For example: page 14; T3.3 Incorporate shoulder, edge line, and centerline rumble strips in road designs THAT alert drivers of lane departing vehicles, WHILE PRIORITIZING THE MOST VULNERABLE USERS . Incorporate physical barriers into road designs to prevent collisions.</p> <p>pg 17. Consider stronger language toward the most vulnerable. For example, replace the word "incorporate" with "prioritize. T1.2 Incorporate transit, bicyclists, and pedestrians in intersection design. Provide facilities to accommodate people walking, rolling, and bicycling to limit conflicts with vehicles.</p> <p>pg 18. Under STRATEGY 3. IMPROVE ROAD DESIGN AND SPEED LIMIT SIGNING, include at least a brief reference to the most vulnerable, land use (tech memo 18-07-TS-05), and to PBPD (http://www.dot.state.mn.us/pbpd/). Perhaps in T3.1 Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds BASED ON LAND USE. Use road diets where appropriate.</p> <p>pg 19. T1.1 See above comment regarding rumble strips, etc. Consider similar language here.</p> <p>pg 21. Consider more references to partnerships and planning for increased transit/ non-motorized use. For example: T4.1 Increase PLANNING and funding to make</p>	<p>including the Statewide Multimodal Transportation Plan. MnDOT will continue to coordinate with other state agencies on areas such as sustainability.</p> <p>The plan has a strategic focus area to address pedestrian crashes. People walking and rolling are referenced in multiple other focus areas, including in intersections T2.1. Decisions about rumble strip design are made at the project level.</p> <p>The work zone focus area includes tactic T3.3 Maintain accessible pedestrian routes with Alternative Pedestrian Routes and Temporary Pedestrian Access Routes and provide clear bicycle detour routes. Protect pedestrian routes if they are detoured into the roadway.</p>	<p>accommodate people walking, rolling, and bicycling to limit conflicts with vehicles.”</p> <p>On page 18, added “based on land use” and “Performance Based Practical Design” to T3.1. The tactic now states “Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds based on land use. Use road diets where appropriate.”</p> <p>On page 22, added “Based on land use” to T2.3. Tactic now states, “Based on land use, design roads and facilities for pedestrians, such as sidewalks, mid-block breaks, and bump outs.”</p>

ID	Source	Name	Comment	Response	Change to Document
			<p>community-based mobility options more AVAILABLE AND accessible, especially in rural areas.</p> <p>pg 22. Strongly throughout, refer to land use/land use tech memo. For example: T2.3 BASED ON LAND USE, Design roads and facilities for pedestrians, such as sidewalks, mid-block breaks, and bump outs. Identify areas with inadequate pedestrian facilities that could be improved, including in rural areas or on tribal lands. Provide the appropriate number of safe pedestrian crossings to accommodate pedestrian needs.</p> <p>pg 22. Under STRATEGY 2 PROMOTE POLICY CHANGES THAT IMPACT PEDESTRIAN SAFETY. If MN will ever really achieve Vision Zero, it's time to prioritize the most vulnerable. Create a new bullet: T3.4. Prioritize the most vulnerable user in all policies, practices, and designs.</p> <p>pg 24. Under STRATEGY 4 DESIGN SAFER WORK ZONES. Add a reference to prioritizing the most vulnerable in all work zones/all phases.</p> <p>Avoid buzzwords throughout. For example, replace "utilize" with "use".</p>		
20	Web	Sheila Denton	<p>I represent Child Passenger Safety. I would like to see better data collected on the child passenger safety. I would also like to see child passenger safety implemented into more LE, Fire and EMS Programs. LE, Fire and EMS are often the first on scene. They should be very well versed with the knowledge of child passenger safety. I would also like to see more of the child passenger safety up front and foremost, rather than just listed as a "subtitle"</p>	<p>Thank you for your comment. The data suggestion would need to come through the Traffic Records Coordinating Committee at the Department of Public Safety. The educational/knowledge components would need to come through the POST Board, EMSRB, and the state fire service training consortium. Child passenger safety is included throughout the Unbelted Occupants focus area.</p>	No change
21	Email	Jonathan Olsen	<p>These comments and suggestions are only directed at the action oriented strategies related to the focus of commercial vehicles. Under strategy T1.4, the plan states 'require agriculture trucks to follow commercial vehicle inspection requirements'. Would you please provide me some details on what this is specifically being directed towards? Is it directed at ensuring law enforcement (State Patrol) continues to</p>	<p>Thank you for your comment. Tactic T1.4 under Commercial Vehicles has been removed due to conflicts with federal law.</p>	<p>On page 25, removed tactic 1.4, "Require agriculture trucks to follow</p>

ID	Source	Name	Comment	Response	Change to Document
			<p>maintain the ability to conduct random roadside inspections on farm/agriculture trucks? Is it directed at requiring agriculture trucks to submit to the annual inspection like other commercial vehicles? If it is the latter, I do not believe that it is a worthwhile strategy. By statute, an agriculture truck is exempt from the annual inspection requirement. It was a change in state statute because the federal government decided to exempt them (farmers) from the same requirement, federally. With the federal government exempting them, changing the law back in Minnesota to what it was prior to the federal exemption would not be possible. There is no legislative appetite to require a farm truck to go through the annual inspection process.</p> <p>Secondly, there is no mention of school buses or enforcement around school buses in the plan. There is a large problem revolving around motorists failing to obey school buses' 8-way lighting system and stop arms. Perhaps a strategy to replace the inspection requirement strategy discussed above would be to increase education and enforcement efforts surrounding school bus stop arm violations.</p> <p>Lastly, an additional strategy under category 4 (vehicle technology) could include the support and study lane departure and emergency automatic braking technology that is starting to emerge in the commercial vehicle industry.</p> <p>Thank you for the consideration. Jon</p>	<p>The Pedestrian focus area now includes a tactic to explore school bus stop arm violation camera enforcement.</p>	<p>commercial vehicle inspection requirements.”</p> <p>On page 22, added tactic T3.3 “Explore school bus stop arm violation camera enforcement.”</p>
22	Web	Matthew Hendricks	<p>Please be more explicit in directing engineers in all jurisdictions (and those who work for consultants) to design narrower lanes as a tool for encouraging safer driving. In many contexts, engineers will insist on lanes that are 11-13 feet wide, and these are simply too wide for urban, town, and suburban contexts where the streets are multi-modal and the wide lanes encourage drivers to ignore speed limits. Engineers should be directed to design 10-foot lanes, unless there is a compelling, specific reason why a wider (more dangerous) lane is needed in a particular situation.</p> <p>When engineers refuse to design narrower lanes, this is ethically equivalent to a doctor refusing to prescribe a life-saving medicine. But in my experience, engineers are quite comfortable with working in this ethical red zone. I believe this is in large part due to training they received that equated wider streets with safety, based on highway contexts that aren't relevant for most situations in cities, towns, and suburbs. The evidence is clear that speed is dangerous and too-often deadly. The evidence is clear that wider lanes encourage speeding. MnDOT should do everything in its power to guide engineers towards designing streets and roads that are as safe as possible.</p>	<p>The SHSP is a plan for all roadways in Minnesota and the strategies need to be appropriately broad. Under speeding, the plan has strategy T3.1 Use geometric elements and traffic calming techniques to design roads for appropriate speeds. This tactic has been changed slightly in the final draft. See change to the right. Narrower lanes would fit within this strategy. Lane widths are determined at the project level.</p>	<p>On page 18, added “based on land use” and “Performance Based Practical Design” to T3.1. The tactic now states “Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds</p>

ID	Source	Name	Comment	Response	Change to Document
			Thank you for considering my comment, and for all your work on the TZD effort.		based on land use. Use road diets where appropriate.”
23	Web	Lewis Davis	<p>I don't know if I'm misunderstanding what this comment form is for it not. A round about (even though I don't like the idea, means I'd have to slow down more) would be nice at the intersection of highway 2 and highway 194. It can't be a shotty one like hwy 33 and I 35. Need one that literally forces people to slow down to a proper speed. Once this is completed. A turn lane from East bound hwy 194 onto Jackson rd .5 miles east of hwy 2 and 194 would be a good asset.</p>	<p>Thank you for your comment. The SHSP is not a project-specific plan. This comment will be shared with relevant MnDOT District staff.</p>	No change
24	Web	Lara Holland	Some version of graduated licensing should be applied to motorcycle endorsements, regardless of age of applicant.	Thank you for your input. We will consult with the DPS Motorcycle Safety Training Program and Task Force to explore this as an option.	No change
25	Web	Vicki Johnson	<p>Overall, I think the plan is simpler and easier to understand than the 2014-2019 SHSP. I really appreciate the various strategies and tactics that were developed to address the core and strategic focus areas. I do agree that some of these strategies and tactics will be able to assist with the connected and support solutions focus areas. I would have liked the draft plan to include the SHSP Technical Report (as an appendix) so I could see the one year action plans for those tactics designated to be completed within the first year of plan adoption.</p> <p>Other than that, very well put together. Here's hoping we can accomplish (and surpass) the 2025 goal.</p>	<p>Thank you for your comment. No response needed. The technical report will be available with the final SHSP.</p>	No change
26	E-mail	Mark Kinde, Minnesota Department of Health	<p>I love that the framework for this plan is that it is a plan for all of Minnesota. The emphasis on partnership, coordination, the imperative of the 4Es ... Just well done!</p> <p>I love the call to innovation. The Plan recognizes that we must be willing to do things differently if we are to get more significant improvements.</p> <p>While the MDH longs for Zero deaths, we affirm and support the direction of the SHSP for 225 deaths and 980 serious injuries per year by 2025.</p> <p>We support the selected focus areas. We acknowledge the continued imperative of cross-disciplinary approaches to prevention that will include (and result in) culture change. We need to make a difference in alcohol use: this will affect pedestrian, motor cycle and motor vehicle crashes, deaths and injuries, in particular.</p>	<p>Thank you for your comment. We look forward to working with the Minnesota Department of Health on implementing this plan.</p>	No change

ID	Source	Name	Comment	Response	Change to Document
			<p>Continued attention at the community level to design will help us plan for pedestrian and bicycle options.</p> <p>While some emphasis on Connected and Autonomous Vehicles (CAV) should continue, it is the sense of the Injury Program that it may still be a generation (20 years) before community adoption (and affordability) is widespread and will make a difference on injury and death rates.</p> <p>As we complete our review (mid-March), the effect of COVID-19 has the potential to radically decrease injury and death by dramatically altering exposure.</p> <p>We commit to continuous quality improvement in strengthening Minnesota's statewide trauma system. This includes both in-patient care as well as emergency response, triage and transport.</p> <p>The action-oriented strategies and tactics are affirmed and recommended. There is enough specificity to allow for significant change to happen.</p> <p>Figure 9 (near the end of the document) may be a great place to link to SHIP or MDH state plans ...</p> <p>MN TZD acknowledges that the 4 Es are not comprehensive and often refer to at least a fifth E, everyone else. Another E is Epidemiology and "Courts and legislation" is identified on the MN TZD website as another partner.</p> <p>It is important to emphasize the importance and value of the support, use and analysis of integrated data that links crash data with hospital, trauma system and EMS data for a more complete picture of injury severity and outcome in relation to crash data factors.</p> <p>MDH is grateful the opportunity to review and affirm.</p>		
27	E-mail	Chad Ellos, Hennepin County	<p>On Figure 1, two Identifies in a row - consider changing to "Find" or "Search for." On page 3, change "determined" to "recorded." On page 4, add "annual" to "reduce traffic deaths to 225 or fewer..."</p> <p>Consider working with the Bicycle Alliance of Minnesota to build the reach and effectiveness of their People Friendly Driver Program. https://www.bikemn.org/education/people-friendly-driver-pilot-program. Consider adopting or partnering with the Bicycle Alliance of Minnesota Walk! Bike! Fun! Pedestrian and Bicycle Safety Curriculum. https://www.bikemn.org/education/walk-bike-fun.</p> <p>For tactic T1.4 on page 15, add and/or frequently over serve legal age patrons. For intersections, T2.2 Consider including other engineering solutions such as bumpouts or refuge islands. T2.4, Consider protected only left-turn signal phasing when pedestrian push buttons are activated. T3.1 Consider replacing 'reduce' with</p>	<p>Thank you for comments.</p> <p>When implementing the strategies and tactics related to walking and biking education, the Bicycle Alliance of Minnesota will be a key partner.</p> <p>The tactics in the Intersections focus area are written broadly to account for many different safety treatments that may be appropriate at a given location. Your suggestions are examples</p>	<p>On page 17, moved tactic T4.4 "Explore the potential for automated red-light enforcement cameras in Minnesota by researching its effectiveness in states that have implemented it" from Years 3-5</p>

ID	Source	Name	Comment	Response	Change to Document
			<p>'eliminate.' T3.3 Consider including 'systemic analysis.' T4.4 Consider pursuing Red Light enforcement cameras sooner (Years 1 - 2).</p> <p>For speeding, T2.4 Consider including 'automated enforcement for school bus stop arm infractions' as well (cameras on school buses). T3.2 Consider updating the process / methodology for determining authorized speed limits that relies heavily (mostly) on the 85th percentile speed data collected - can drivers alone be trusted to determine / set a comfortable and safe speed that is acceptable for all users of the right of way? NCUTCD has made recommendations for the next MUTCD update regarding the statement of setting speed limits, "Remove the guidance that speed limits in speed zones be within 5 mph of the 85th percentile speed"</p> <p>Consider adding a section for bicycles with specific tactics.</p> <p>For Younger Drivers T1.5, Mention languages currently translated into (Spanish, ...).</p>	<p>of improvements consistent with those tactics.</p> <p>The Speeding focus area includes tactic T3.2 "Use appropriate speed limits that account for roadway design, traffic, land use, and context." The language is broad to allow for flexibility in setting speed limits and potential future changes to guidance.</p> <p>The Local Road Research Board is currently conducting study 2019-060 Impact of Speed Limit Changes on Urban Streets. Results from this study will be incorporated into future speed limit guidance</p> <p>Bicyclists are included in the Connected focus area grouping. The Connected focus areas represent a smaller portion of crashes compared to other focus areas, but most crashes are correlated with other focus areas. Crashes in these focus areas are addressed through strategies and tactics in the Core and Strategic focus areas.</p> <p>Bicyclists are included in strategies and tactics across multiple focus areas.</p>	<p>timeframe to Years 1-2.</p> <p>On page 22, added tactic T3.3 "Explore school bus stop arm violation camera enforcement."</p> <p>On page 23, added footnote which states, "The Minnesota Driver's Manual is currently translated into Spanish in addition to English."</p>
28	E-mail	Jennifer Hager, City of Minneapolis	See attached letter	Responses below by topic	
29	E-mail	Heidi Schallberg,	See attached letter	Responses below by topic	

ID	Source	Name	Comment	Response	Change to Document
		Metropolitan Council			
30	E-mail	Dan McCormick, Carver County	See attached letter	Responses below by topic	

Strategic Highway Safety Plan Comments by Category

Category: Child Safety

ID	Source	Name	Comment	Response	Change to Document
20	Web	Sheila Denton	I represent Child Passenger Safety. I would like to see better data collected on the child passenger safety. I would also like to see child passenger safety implemented into more LE, Fire and EMS Programs. LE, Fire and EMS are often the first on scene. They should be very well versed with the knowledge of child passenger safety. I would also like to see more of the child passenger safety up front and foremost, rather than just listed as a "subtitle"	Thank you for your comment. The data suggestion would need to come through the Traffic Records Coordinating Committee at the Department of Public Safety. The educational/knowledge components would need to come through the POST Board, EMSRB, and the state fire service training consortium. Child passenger safety is included throughout the Unbelted Occupants focus area.	No change

Category: Commercial Vehicles

ID	Source	Name	Comment	Response	Change to Document
18	Web	Will Wlizlo	Please encourage enforcement of commercial vehicles illegally parked in bicycle and pedestrian facilities. Forcing a bicyclist into a road, for example, creates a hazard that neither the bicyclist nor the other vehicle traffic are expecting, ratcheting up safety concerns.	Thank you for your comment. Enforcement is an important component of the plan. Enforcement of parking restrictions is handled by various jurisdictions throughout the state.	No change
21	Email	Jonathan Olsen	These comments and suggestions are only directed at the action oriented strategies related to the focus of commercial vehicles. Under strategy T1.4, the plan states 'require	Thank you for your comment. Tactic T1.4 under Commercial	On page 25, removed tactic

ID	Source	Name	Comment	Response	Change to Document
			<p>agriculture trucks to follow commercial vehicle inspection requirements’. Would you please provide me some details on what this is specifically being directed towards? Is it directed at ensuring law enforcement (State Patrol) continues to maintain the ability to conduct random roadside inspections on farm/agriculture trucks? Is it directed at requiring agriculture trucks to submit to the annual inspection like other commercial vehicles? If it is the latter, I do not believe that it is a worth-while strategy. By statute, an agriculture truck is exempt from the annual inspection requirement. It was a change in state statute because the federal government decided to exempt them (farmers) from the same requirement, federally. With the federal government exempting them, changing the law back in Minnesota to what it was prior to the federal exemption would not be possible. There is no legislative appetite to require a farm truck to go through the annual inspection process.</p> <p>Secondly, there is no mention of school buses or enforcement around school buses in the plan. There is a large problem revolving around motorists failing to obey school buses’ 8-way lighting system and stop arms. Perhaps a strategy to replace the inspection requirement strategy discussed above would be to increase education and enforcement efforts surrounding school bus stop arm violations.</p> <p>Lastly, an additional strategy under category 4 (vehicle technology) could include the support and study lane departure and emergency automatic braking technology that is starting to emerge in the commercial vehicle industry.</p> <p style="text-align: center;">Thank you for the consideration. Jon</p>	<p>Vehicles has been removed due to conflicts with federal law.</p> <p>The Pedestrian focus area now includes a tactic to explore school bus stop arm violation camera enforcement.</p>	<p>1.4, “Require agriculture trucks to follow commercial vehicle inspection requirements.”</p> <p>On page 22, added tactic T3.3 “Explore school bus stop arm violation camera enforcement.”</p>
28	E-mail	Jennifer Hager, City of Minneapolis	<p>In the commercial vehicles section (page 25), we appreciate the strategy to support new vehicle technology, but suggest expanding that to include studying the potential ways to get more safety improvements beyond just platooning. One example is that NTSB has been looking at technology to reduce blind spots, which are especially challenging for trucks and pedestrians and bicyclists.</p>	<p>The SHSP supports new vehicle technology to improve safety for all vehicle types. The plan includes tactic T3.4 “Support the transition to autonomous vehicles and other emerging motor vehicle technology to reduce human error, including in interactions with people walking, rolling, or bicycling” in the Inattentive Drivers focus area.</p>	<p>No change</p>

ID	Source	Name	Comment	Response	Change to Document
29	E-mail	Heidi Schallberg, Metropolitan Council	<p>On page 25, add new tactic under Support New Vehicle Technology: T4.2 Add side underride guards to trucks to protect pedestrians, bicyclists, and motorcyclists. As background: New York City is one example of adding this equipment to their trucks as part of their Vision Zero program. Background links for more info on why this is important: https://usa.streetsblog.org/2016/10/31/why-american-trucks-are-so-deadly-for-pedestriansand-cyclists/ https://www.volpe.dot.gov/event/protecting-pedestrians-and-bicyclists-truck-side-guards</p>	<p>This is an emerging safety research area for Commercial Vehicles. MnDOT will review safety research in this area from NHTSA and incorporate into future safety plans as necessary.</p>	No change

Category: Design

ID	Source	Name	Comment	Response	Change to Document
22	Web	Matthew Hendricks	<p>Please be more explicit in directing engineers in all jurisdictions (and those who work for consultants) to design narrower lanes as a tool for encouraging safer driving. In many contexts, engineers will insist on lanes that are 11-13 feet wide, and these are simply too wide for urban, town, and suburban contexts where the streets are multi-modal and the wide lanes encourage drivers to ignore speed limits. Engineers should be directed to design 10-foot lanes, unless there is a compelling, specific reason why a wider (more dangerous) lane is needed in a particular situation.</p> <p>When engineers refuse to design narrower lanes, this is ethically equivalent to a doctor refusing to prescribe a life-saving medicine. But in my experience, engineers are quite comfortable with working in this ethical red zone. I believe this is in large part due to training they received that equated wider streets with safety, based on highway contexts that aren't relevant for most situations in cities, towns, and suburbs. The evidence is clear that speed is dangerous and too-often deadly. The evidence is clear that wider lanes encourage speeding. MNDot should do everything in its power to guide engineers towards designing streets and roads that are as safe as possible.</p> <p>Thank you for considering my comment, and for all your work on the TZD effort.</p>	<p>The SHSP is a plan for all roadways in Minnesota and the strategies need to be appropriately broad. Under speeding, the plan has strategy T3.1 Use geometric elements and traffic calming techniques to design roads for appropriate speeds. This tactic has been changed slightly in the final draft. See change to the right. Narrower lanes would fit within this strategy. Lane widths are determined at the project level.</p>	<p>On page 18, added "based on land use" and "Performance Based Practical Design" to T3.1. The tactic now states "Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds based on land use. Use road diets where appropriate."</p>

Category: EMS

ID	Source	Name	Comment	Response	Change to Document
10	Web	Mack Backlund	<p>Have you considered how "traffic calming" has increased the response times of police, fire, EMTs and ambulances? Please reply.</p> <p>Thank you. Mack Backlund</p>	<p>Emergency response times are a consideration at the project level. As part of project development and engagement, MnDOT works with emergency responders to ensure adequate response on our roadway and that roadway design allows for emergency vehicle access.</p>	No change

Category: Enforcement

ID	Source	Name	Comment	Response	Change to Document
4	Web	Kenneth Harden	<p>I do NOT support any automated systems to issue citations and/or collect fines under any circumstance. I only support these actions being taken by a police officer or other law officer who is observing the offence and making a traffic stop to cite the driver. If these automated systems are proposed I would want to see the entire Toward Zero Death program suspended in its entirety.</p>	<p>The SHSP and the TZD program take a comprehensive approach to traffic safety in Minnesota. The plan is developed in coordination with DPS, MDH, and MnDOT. That is why the SHSP includes a strategy to research the effectiveness of automated enforcement for speeding in work and school zones, and for red light running. The plan also includes strategies for camera-assisted enforcement which uses cameras to aid officers in enforcement.</p>	No change
5	Web	Ed Faulkner Sr	<p>Why isn't there active enforcement of the new MN law which is supposed to keep slower drivers out of the left lane unless passing another vehicle??</p>	<p>The left lane law is not new. The language was simply updated. Law enforcement takes action when it is appropriate. These behaviors result in very few crashes.</p>	No change

ID	Source	Name	Comment	Response	Change to Document
7	Web	Dennis Maciej	<p>My primary concern is with inattentive drivers and the lack of accountability for the offender. I certainly agree with the strategies outlined including increased education to all drivers, more enforcement, and reduced leniency in sentencing. I would like to see immediate restrictions of driving privileges when offenders cause injuries and property damage. My experience involves my son who is the victim of a delinquent distracted driver. Nearly four months after the incident, 3 spent in the hospital, he is still unable to walk or do basic functions. Following many surgeries he is prescribed many different pain meds used daily and is still facing future surgeries. The medical bills are in the millions of dollars, plus the loss of wages and on going pain and suffering. All this while the offender goes on with his daily routine as if nothing happened. He was cited for failure to yield right of way which is viewed as a petty offense. Law enforcement and courts are more concerned with protecting a juvenile offender than aiding the victim of the offense. A major life changing event for my son and his family is certainly no petty offense.</p>	<p>Thank you for your comment. Inattentive driving is a core focus area of this plan. The SHSP includes multiple strategies that are in-line with your suggestions including T2.2 - Encourage judges to reduce leniency in sentencing distracted driving offenders and T2.3 - Update penalties for distracted driving violations that result in death and serious injury. In addition, the new hands-free law should reduce crashes related to inattentive driving.</p>	<p>On page 14, tactic 2.3 now states, "Support legislation that would update distracted driving penalties for crashes involving serious injury or death."</p>
28	E-mail	Jennifer Hager, City of Minneapolis	<p>We support including actions related to automated enforcement. For T4.4 on page 17 and T2.3 on page 18, we suggest expanding the research to include "... and recommending systems around potential use of automated enforcement, including technical, legal, privacy, and equity considerations." The safety benefits of automated enforcement are well documented, but there are a lot of unanswered questions with respect to implementation details that would need to be answered before a pilot program around schools, work zones or a general program could be implemented.</p>	<p>Thank you for your comment. Change made.</p>	<p>On page 17 and 18, tactics now state, "Explore the potential for automated speed/red-light enforcement cameras in Minnesota by researching its effectiveness in states that have implemented it and any technical, legal, privacy, and equity barriers."</p>

ID	Source	Name	Comment	Response	Change to Document
29	E-mail	Heidi Schallberg, Metropolitan Council	On page 18, we support the potential for automated speed enforcement in Minnesota, especially in helping to improve traffic safety while minimizing risks related to implicit bias and human error related to policing.	Thank you for your comment. No response needed.	No change

Category: Education

ID	Source	Name	Comment	Response	Change to Document
5	Web	Earl Faulkner Sr	<p>MNDOT and public service announcements should re-educate drivers on proper merging at freeway cloverleafs. It's very simple, but no agency talks to the driving public about it: vehicles merging out of a cloverleaf need to be accelerating; vehicles entering a clover leaf must be slowing. Obviously, the vehicle slowing should fall in "behind" the vehicle accelerating. The sequence described here, rarely occurs.</p> <p>The driving public should be educated to use the "on ramp" onto a freeway as an accelerating lane whenever possible. The closer a merging vehicle's speed is to the speed of traffic being merged into, the safer the merge.</p> <p>Enforcement officers should stop offenders and issue, not a ticket, but a verbal explanation along with an information card on these details. Public service announcements should be broadcast as well.</p> <p>Thank you.</p>	Education is a large component of the TZD program. MnDOT has led education campaigns on many aspects of driver behavior including zipper merges. MnDOT evaluates interchange designs, where possible, to improve mobility and safety. For your last point, the TZD program has developed an information card to use to educate motorists on new laws and driver expectations.	No change
12	Web	Jeff Lenz	Once again I feel the biggest hurdle to so much of this is education. How do we educate the public on new things. I would like to see mandatory drivers training for ALL individuals every 8 years? Maybe a 4 hour refresher course. Work with insurance companies to make this happen? Almost all vocations have continuing education, but not driving and this needs to change. I am currently in Engineering and Education. I work for MnDOT and teach work zone safety in drivers ed classes.	Thank you for your comments. Education is a major component of the TZD program and the SHSP action oriented strategies. The plan is intended for all transportation agencies and the public.	No change

Category: General

ID	Source	Name	Comment	Response	Change to Document
1	Web	Jackson Hurst	I approve of the safety plan	Thank you for your comment.	No change
8	Web	Shawn Schloesser	General overview, no need to include all the acronyms if they are not used e.g. POLD. Suggest not using acronyms unless they are explained on the same page to ease reading.	Thank you for your comment. Change made.	Removed acronyms that are only used once in the document.
12	Web	Jeff Lenz	I would like to submit the following comments: 1) I would like to push to make the 4 E's, 5 E's as Everybody is needed to make TZD work. This is mentioned several times thru-out the document. On page 2 on the right side, that side bar really emphasizes the need for Everyone.	The TZD group is currently undergoing a re-evaluation of its approach and methods. These comments will be shared with the TZD Leadership Team.	No change
18	Web	Will Wlizio	Hello, planners, Thank you for inviting comment on the strategic plan. I'm thankful for many of the priorities you've identified already. These include investment in safety programming for those driving around pedestrians, bicyclists, and other vulnerable users; an emphasis on intersection design, redesign, and community input; and attention to enforcement of and strengthening of the hands-free law. I'm broadly in support of the strategic plan.	Thank you for your comment. No response needed.	No change
19	Web	Liz Walton	Please consider at least one reference that it is POSSIBLE to achieve zero (both Oslo and Helsinki have achieved zero). MN should challenge itself to be the first in the US to achieve zero. Consider reviewing the Oslo/Helsinki plans to see if there is anything MN should identify as policies/strategies to consider in near and long term----maybe reviewing the plans is a new bullet. Please consider at least a brief/better reference to sustainability/climate crisis/reducing motor vehicle use and partnerships within key MnDOT offices and other state offices (DPS, Health, etc). Motorized vehicles on state highways typically travel at high speed--and speed is what kills (see EXHIBIT 2-1: Operating Speed and Crash Severity in the MnDOT Bike Design Manual; http://www.dot.state.mn.us/bike/bicycle-facility-design-manual.html). The Highway Safety Plan must be strongly tied to work in other areas within MnDOT, such as the STAC (http://www.dot.state.mn.us/sustainability/advisory-council.html). Avoid buzzwords throughout. For example, replace "utilize" with "use".	The plan emphasizes that 0 fatalities is the ultimate goal of TZD in the State of Minnesota. The SHSP is an important step towards achieving that goal. MnDOT coordinates its efforts through statewide plans including the Statewide Multimodal Transportation Plan. MnDOT will continue to coordinate with other state agencies on areas such as sustainability.	No change
25	Web	Vicki Johnson	Overall, I think the plan is simpler and easier to understand than the 2014-2019 SHSP. I really appreciate the various strategies and tactics that were developed to address the core	Thank you for your comment. No response needed. The technical	No change

ID	Source	Name	Comment	Response	Change to Document
			<p>and strategic focus areas. I do agree that some of these strategies and tactics will be able to assist with the connected and support solutions focus areas. I would have liked the draft plan to include the SHSP Technical Report (as an appendix) so I could see the one year action plans for those tactics designated to be completed within the first year of plan adoption.</p> <p>Other than that, very well put together. Here's hoping we can accomplish (and surpass) the 2025 goal.</p>	<p>report will be available with the final SHSP.</p>	
26	E-mail	Mark Kinde, Minnesota Department of Health	<p>I love that the framework for this plan is that it is a plan for all of Minnesota. The emphasis on partnership, coordination, the imperative of the 4Es ... Just well done!</p> <p>I love the call to innovation. The Plan recognizes that we must be willing to do things differently if we are to get more significant improvements.</p> <p>While the MDH longs for Zero deaths, we affirm and support the direction of the SHSP for 225 deaths and 980 serious injuries per year by 2025.</p> <p>We support the selected focus areas. We acknowledge the continued imperative of cross-disciplinary approaches to prevention that will include (and result in) culture change. We need to make a difference in alcohol use: this will affect pedestrian, motor cycle and motor vehicle crashes, deaths and injuries, in particular. Continued attention at the community level to design will help us plan for pedestrian and bicycle options.</p> <p>While some emphasis on Connected and Autonomous Vehicles (CAV) should continue, it is the sense of the Injury Program that it may still be a generation (20 years) before community adoption (and affordability) is widespread and will make a difference on injury and death rates.</p> <p>As we complete our review (mid-March), the effect of COVID-19 has the potential to radically decrease injury and death by dramatically altering exposure.</p> <p>We commit to continuous quality improvement in strengthening Minnesota’s statewide trauma system. This includes both in-patient care as well as emergency response, triage and transport.</p> <p>The action-oriented strategies and tactics are affirmed and recommended. There is enough specificity to allow for significant change to happen.</p> <p>Figure 9 (near the end of the document) may be a great place to link to SHIP or MDH state plans ...</p> <p>MN TZD acknowledges that the 4 Es are not comprehensive and often refer to at least a fifth E, everyone else. Another E is Epidemiology and “Courts and legislation” is identified on the MN TZD website as another partner.</p>	<p>Thank you for your comment. We look forward to working with the Minnesota Department of Health on implementing this plan.</p>	No change

ID	Source	Name	Comment	Response	Change to Document
			It is important to emphasize the importance and value of the support, use and analysis of integrated data that links crash data with hospital, trauma system and EMS data for a more complete picture of injury severity and outcome in relation to crash data factors. MDH is grateful the opportunity to review and affirm.		
27	E-mail	Chad Ellos, Hennepin County	On Figure 1, two Identifies in a row - consider changing to "Find" or "Search for." On page 3, change "determined" to "recorded." On page 4, add "annual" to "reduce traffic deaths to 225 or fewer..."	Thank you for your comment. No change recommended.	No change
28	E-mail	Jennifer Hager, City of Minneapolis	We appreciate the thoughtful data-driven approach to the draft 2020-2024 Minnesota Strategic Highway Safety Plan. A few specific comments on the draft: We support having a long-term goal to eliminate deaths and serious injuries on Minnesota roadways and aggressive, but achievable short-term goals.	Thank you for your comment. No response needed.	No change
29	E-mail	Heidi Schallberg, Metropolitan Council	<p>1. It would be helpful to add an index of the tactics (at least those marked with check marks for the 5 year plan) organized by the 4 Es as a cross reference to help show what the priorities are in each of those areas.</p> <p>2. Although equity is referenced in relation to the 6 Es used in Safe Routes to School (on page 22), there is little mention or consideration of equity overall. This should become an explicit consideration for traffic safety work, and we would encourage adding equity as an "E" in future versions of this plan.</p> <p>4. In the fifth sentence on page 4, suggest adding the following language in bold. "In addition to the emotional impacts, these deaths and injuries cost Minnesotans over \$3.6 billion across five years."</p> <p>5. MnDOT should consider adding data related to Figure 7 Minnesota Death and Serious Injury Crashes by Focus Area (page 9) for the Twin Cities and greater Minnesota, in addition to the statewide numbers shown. When this draft plan was presented to Metropolitan Council committees, key differences in these were mentioned (such as the Twin Cities being higher for pedestrians and bicyclists, while lower for lane departures), but these important distinctions should be discussed in this plan.</p>	<p>The final SHSP will be published with an accompanying technical report which will have a matrix of tactics cross-referenced by focus area.</p> <p>The SHSP is a statewide plan. Regional differences in crash data and approaches to safety investment will be addressed in the upcoming District Safety Plans and County Safety Plans.</p>	On page 4, added, "In addition to the emotional impacts" to the sentence on the cost of crashes.
30	E-mail	Dan McCormick, Carver County	Thank you for the opportunity to comment on the subject plan. Overall the Strategic Highway Safety Plan is an excellent document and umbrella type system to help organize and lead other or subordinate state, county, and city plans and programs.	Thank you for your comment. No response needed.	No change

Category: Impairment

ID	Source	Name	Comment	Response	Change to Document
9	Web	Daniel Bunde	Good afternoon, My idea isn't new, I have tried to push this idea before through Retired State Rep, Tony Cornish, with limited success. I'm going on my 22nd year in Law Enforcement and have had many driving complaint calls for service. These driving complaints can be anything from a drunk driver to some sort of medical issue. Many times we are unable to locate the subject vehicle or the vehicle is located due to a crash. If the state licensing required a phone number attached to your D.L., it would give us another tool to get the driver stopped and off the road. Example, My brother left the City of Lake Crystal heading towards Mankato. He was recovering from surgery and on a prescription pain killer. On the way to Mankato he had at least three motorists report that he was all over the road. He wasn't located. On his return trip back there was another report on his bad driving. As he entered the City of Lake Crystal, his vehicle left the roadway flipping over the guardrail and come to rest in the lake. My brother survived. If there would have been a contact number, he could have been called by an officer and ordered to pull off to the side of the road until he was cleared. If there was a spot on the form to add it but not make it a law, enough people would do it voluntarily. This would help dispatch and officers stop these potential deadly outcomes.	Thank you for your comment. There are significant privacy challenges with this as well as capacity within the driver's license system to store such data.	No change
12	Web	Jeff Lenz	5) On page 15, - I would like to see a wider use of the POLD program. I believe not all agencies are using this tool. Also push for more alcohol servers to push for more awareness of overserving which is mentioned, but I think it needs to be pushed harder.	Thank you for your comment.	No change
18	Web	Will Wlizlo	Please continue to work toward decreasing the legal BAC. This is a modern society of intelligent humans -- we should be working toward zero tolerance of an alcohol in a motorists system.	Thank you for your comment. Legal BAC levels are currently being examined on a national level and we will monitor the discussions and the data.	No change

Category: Implementation

ID	Source	Name	Comment	Response	Change to Document
30	E-mail	Dan McCormick, Carver County	<p>Comments we would share at the County-level are how to best provide implementation standards and direct, independent or more focused funding toward safety elements and projects, especially core focus areas of emphasis noted in the plan and areas of concern at the County level.</p> <p>We suggest the plan or companion program should recognize and better coordinate a system where traffic safety fundamentals and best practices would be more systematically</p>	The final SHSP will be published with an accompanying technical report and action plans for priority tactics. These action plans will go into more detail about how the strategies and tactics will	No change

ID	Source	Name	Comment	Response	Change to Document
			<p>incorporated in as many projects as possible, and in a way that is consistently balanced to all 87 counties or geographic areas, like the Metro area.</p> <p>In the same vein, we suggest the plan or companion program should recognize and better coordinate existing future County Roadway Safety Plans. In some sense or at least in general, it seems like Counties are on their own for implementation, but perhaps more could be done to partner or complement MnDOT and/or local highways and facilities to tackle more complex locations or areas of concern together as a larger, stronger team. High Risk Rural Roads are another big concern of Carver County and likely other counties. Highways like Hwy 12, Hwy 14, and Hwy 212 where several fatalities continue to occur on older, 2-lane rural highways seem like they should be receiving more attention and resources. We believe MnDOT should consider committing more resources or requirements to reduce death rates on rural roads of all classifications.</p> <p>The TZD Program, while laudatory and open to engineering, seems to be more focused on enforcement and enforcement-led education and outreach, and grant programs related thereto. The 4E's noted in the draft plan and in the TZD traffic safety program could be made stronger by more dedicated resources to Engineering and a 5th "E" of Evaluation. If for example, there are fatal or high injury crashes of any mode in a County, what is MnDOT and the County or Cities going to do? Is there a true "5E" level, all alert focus and funds available on actual TZD efforts? What happens if a fatal traffic crash occurs on a MnDOT highway in a County?</p> <p>One idea that perhaps the draft plan should consider is incorporating more formal TZD principles and programs at all levels of state, county and city, and in a more formal or rigid requirement or process to act promptly, and incorporate safety measures and crash reduction factors of all ranges in the 5Es.</p> <p>Perhaps a more formal Safety Certification Process like WisDOT could be considered? The understanding there is that the Safety Certification Process (SCP) is a step-by-step process of determining whether safety improvements are scoped out early in the process and reviewed as to whether they should be included on a project by screening, quantifying safety mitigation alternatives, monetizing the resulting safety benefits, completing benefit-cost comparisons of the mitigation alternatives, and documenting decisions and judgements throughout the process. Another potential system could follow the flagging thresholds like MnDOT's ADA Technical Memorandum 18-04-OP-01, where like ADA, safety elements would be made a clearer standard requirement in various levels of projects, including State Aid and Rehabilitation projects or the like.</p> <p>Related to this, how do design standards that may include nominal safety elements go further to include more proven safety countermeasures that are supported by safety performance functions and crash reduction factors. The HSIP program is a welcome and</p>	<p>be implemented. Counties are encouraged to implement the strategies and tactics in the SHSP in their own jurisdiction.</p> <p>Following publication of the plan, MnDOT will begin the District Safety Plans and the County Safety Plans. Opportunities to coordinate these various plans will be available in the future.</p> <p>The TZD group is currently undergoing a re-evaluation of its approach and methods. These comments will be shared with the TZD Leadership Team.</p>	

ID	Source	Name	Comment	Response	Change to Document
			wonderful program, but is there a way to add the HSIP type process to as many projects as possible on a larger system-wide basis in other ongoing infrastructure projects?		
29	E-mail	Heidi Schallberg, Metropolitan Council	<p>Specify regional agencies as stakeholders where possible. On page 27 there are two opportunities to do so. "Full and effective SHSP implementation relies on counties, cities, regional, and other governmental agencies..." Also on this page in sidebar: "The SHSP strategies and tactics were informed by several plans and in turn are intended to inform state, regional, local, organization, and coalition plans at their next update."</p> <p>22. We appreciate the clear inclusion of MTPs and TIPs in Figure 9 on page 30 showing their relation to state plans and programs.</p> <p>23. As part of evaluation data collection and analysis, the plan should mention reviewing how to most efficiently invest in safety infrastructure related to fatalities and serious injuries. For example, MnDOT could analyze the amount of safety funding being spent per railroad crossing fatality vs. per intersection fatality.</p>	<p>The Highway Safety Improvement Program focuses on proven cost-effective safety treatments. The focus of the District and County Safety Plans are to target HSIP funding to high-risk facilities with proven safety treatments. Funds for specific safety programs are determined at the federal level.</p>	<p>On page 27, added "regional" to text. New sentence states, "The SHSP strategies and tactics were informed by several plans and in turn are intended to inform state, regional, local, organization and coalition plans at their next update."</p>

Category: Inattention

ID	Source	Name	Comment	Response	Change to Document
6	Web	Lisa Wichman	<p>We could also use tougher fines/penalties inattentive drivers. The "hands free" law has only made a tiny dent in catching violators. I suggest: 1st offense - \$1000 fine, lose license until you see a judge, then pay to take a class so you can watch videos with testimony from family survivors on how inattentive driving has changed their lives forever. Then you have to take your written and road test and pass at a higher standard. 2nd offense - \$10,000 fine, lose your license for a year, then see a judge, do the classes and take your tests again at an even higher standard. 3rd time - 3 strikes your out. If you drive without a license - jail for 5 years, etc. You get my point. I see violators multiple times a day, every single day. Because I abide by the laws, I am unable to report violators while driving. By the time I can safely stop, they are long gone of course. People just don't give a crap as they know the consequences are next to nothing.</p>	<p>Inattentive driving is a core focus area of the plan. The SHSP includes multiple strategies to address penalties for inattentive drivers.</p>	<p>No change</p>
12	Web	Jeff Lenz	<p>2) On page 9 the graph shows inattentive driving is trending down, so our distracted driving push must be working! 4) On page 14, T3.3 - I would say this is on-going. At least at MnDOT and I have seen many counties have rumble strip plans and wider striping in their HSIP projects.</p>	<p>A strategy may be on-going for some agencies but not for others. The timeframes</p>	<p>No change</p>

ID	Source	Name	Comment	Response	Change to Document
				for implementation may vary from agency to agency.	
29	E-mail	Heidi Schallberg, Metropolitan Council	On page 14, suggest adding the wording in bold to T3.4: “Support the transition to autonomous vehicles and other emerging motor vehicle technology to reduce human error, especially in interactions with people walking, rolling, or bicycling. ”	The plan supports the transition to autonomous vehicles as a safety improvement for all users of the roadway system in Minnesota including people walking, rolling, and bicycling.	On page 14, added “including in interactions with people walking, rolling, and bicycling to tactic T3.4 which now states, “Support the transition to autonomous vehicles and other emerging motor vehicle technology to reduce human error, including in interactions with people walking, rolling, or bicycling.”

Category: Incident Management

ID	Source	Name	Comment	Response	Change to Document
13	E-mail	Brian Kary	<p>Hi Everyone, I have a high level comment about the Strategic Highway Safety Plan. One thing we’ve heard from FHWA is to incorporate traffic incident management strategies in state strategic highway safety plans. Implementing TIM strategies can save lives and serious injuries by ensuring our emergency responders are safe on the incident scene and by reducing secondary crashes which can sometimes be more severe than the initial crash due to speed differential at the tail end of the queue.</p> <p>The following is a clipping from page 14 of the FHWA Traffic Incident Management Handbook. https://ops.fhwa.dot.gov/eto_tim_pse/publications/timhandbook/tim_handbook.pdf</p>	Traffic incident management strategies are important for improving traffic safety. These strategies would likely fall under the support solutions focus areas which do not have specific strategies in the plan. However, the SHSP and the TZD program support continued implementation of traffic incident management by MnDOT and other transportation agencies.	No change

Category: Intersections

ID	Source	Name	Comment	Response	Change to Document
27	E-mail	Chad Ellos, Hennepin County	For tactic T1.4 on page 15, add and/or frequently over serve legal age patrons. For intersections, T2.2 Consider including other engineering solutions such as bumpouts or refuge islands. T2.4, Consider protected only left-turn signal phasing when pedestrian push buttons are activated. T3.1 Consider replacing 'reduce' with 'eliminate.' T3.3 Consider including 'systemic analysis.' T4.4 Consider pursuing Red Light enforcement cameras sooner (Years 1 - 2).	The tactics in the Intersections focus area are written broadly to account for many different safety treatments that may be appropriate at a given location. Your suggestions are examples of improvements consistent with those tactics.	On page 17, moved tactic T4.4 "Explore the potential for automated red-light enforcement cameras in Minnesota by researching its effectiveness in states that have implemented it" from Years 3-5 timeframe to Years 1-2.
29	E-mail	Heidi Schallberg, Metropolitan Council	On page 17, earlier drafts of tactic T3.1 included "Move away from level of service focused analysis." We support the inclusion of this original language and suggest it be added back in.	The updated tactic references performance based practical design which balances the needs of all roadway users. It allows for more flexibility in roadway design.	No change

Category: Motorcyclist

ID	Source	Name	Comment	Response	Change to Document
11	Web	David Otis	I'd like to suggest changes in the wording of the Motorcyclist, Strategy 1, Increase Public Awareness and Education to Improve Motorcycle Safety, to the following; T1.3 Encourage insurance companies to offer incentives for experience motorcyclists to take the OTS Intermediate Rider Course as refresher training	Thank you for your comment. It is a worthwhile incentive to explore, but given the time needed to build such a program, we are unable to incorporate into the current SHSP.	No change
14	Web	Glen Jacobsen	Strategic plan for motorcycles should NOT be to 'encourage and educate about benefits of helmet use.' We need to return to a Mandatory helmet law for all motorcyclists. Longer term, consider regulations/law regarding other safety apparel, such as shoes/boots, long pants, long sleeves, etc. But we can and should immediately return to a mandatory helmet for all riders, regardless of age, skill, experience, etc.	Thank you for your comment. The Motorcycle focus area includes tactic T2.3 "Review current legislation to identify opportunities to encourage legislative changes	No change

ID	Source	Name	Comment	Response	Change to Document
			Other states have such laws and the folks that ride here without helmets take one with a wear it where it is required. It is not impossible. It is the single biggest factor in making riding a motorcycle more safe for the riders and passengers.	that reduce the risk of harm to motorcycle riders." This tactic will have an action plan that will include strategies to implement the tactic. We will keep your comment in mind as we develop this action plan and future SHSPs.	
16	Web	Stephen Krenz	I believe that in order to earn a motorcycle endorsement all new motorcycle, scooter and three wheel riders take and successfully complete a Basic Motorcycle class. In addition after successfully completing a Basic Motorcycle class, riders under the age of 21 must ride for six months with no infractions. After the six month period they return to the license station and receive their motorcycle endorsement. Another idea would be that new riders be restricted to 500cc or less engine displacement and a low horsepower machine for a period of time.	Thank you for your input. We will consult with the DPS Motorcycle Safety Training Program and Task Force to explore this as an option.	No change
17	Web	Bill Shaffer	I coordinate the MN Motorcycle Safety Program and had a few comments that I've organized by SHSP tactic number noted in the draft section for Motorcyclists. T1.1 A new updated rider brochure was just done for the 2020 riding season. T1.2 A new updated Sharing the Road brochure was done for 2019. However, we haven't had any new creative concepts on this topic for some years. T1.4 and T1.7 We just completed switching to the Motorcycle Safety Foundation's (MSF) new Basic and Intermediate Rider Courses. MSF curriculum development staff have incorporated both of these tactics into their new curriculum. T3.1 This has been a long standing recommendation of the state's Motorcycle Safety Advisory Task Force, and it's good to see there is interest in implementing it. Thank you for the opportunity to have input into the SHSP.	Thank you for your comment. No response needed.	No change
24	Web	Lara Holland	Some version of graduated licensing should be applied to motorcycle endorsements, regardless of age of applicant.	Thank you for your input. We will consult with the DPS Motorcycle Safety Training Program and Task Force to explore this as an option.	No change

Category: Pedestrian/Bicyclist

ID	Source	Name	Comment	Response	Change to Document
15	Web	Nicole Charles	Lets reduce deaths by funding public transportation- making it totally free for everyone. Increasing routes and frequency. Make public transportation a realistic reliable option for everyone. less cars on the road is safer and better for the environment.	Public transportation is mostly funded and operated at the regional level. The SHSP does not have the ability to fund	No change

ID	Source	Name	Comment	Response	Change to Document
			<p>Also we desperately need to fund sidewalk maintenance and infrastructure... we need to protect the pedestrians!</p> <p>More bike lines and bike infrastructure. Less people driving should be the number one goal- its the direction that we need to head towards for a sustainable society. infrastructure to support indivual cars is a waste of taxpayers money- it is inefficient, and unsustainable. lets focus on making sound alternatives- most people would love to give up the headache of driving and maintaining a car if there was reliable alternatives.</p> <p>its better for public safety.</p>	<p>public transportation. However, MnDOT supports additional funding for all modes of transportation in Minnesota.</p> <p>Pedestrians are a strategic focus area in the plan. The SHSP includes multiple strategies for pedestrians including strategy T3.1 Increase funding for pedestrian safety campaigns and pedestrian facilities.</p>	
18	Web	Will Wlizio	<p>Hello, planners,</p> <p>Thank you for inviting comment on the strategic plan.</p> <p>I'm thankful for many of the priorities you've identified already. These include investment in safety programming for those driving around pedestrians, bicyclists, and other vulnerable users; an emphasis on intersection design, redesign, and community input; and attention to enforcement of and strengthening of the hands-free law. I'm broadly in support of the strategic plan.</p> <p>I'd offer up a few suggestions to change from tactics to prioritized tactics: leading pedestrian intervals, increasing funding for pedestrian infrastructure, and supporting Complete Streets plans. In my experience as a pedestrian, these basics drastically increase my perceived level of safety.</p> <p>Finally, a few other thoughts:</p> <ul style="list-style-type: none"> - Please encourage enforcement of commercial vehicles illegally parked in bicycle and pedestrian facilities. Forcing a bicyclist into a road, for example, creates a hazard that neither the bicyclist nor the other vehicle traffic are expecting, ratcheting up safety concerns. - Right turn on Red should be made illegal. Please study this. When the Bicycle Alliance of Minnesota completed its Great Mn Biking & Walking Survey, it found one of the biggest fears of bicyclists and pedestrians was motorists taking a right turn on red. Other modern countries have long since abandoned this unsafe behavior. Let's lead the way in Minnesota! <p>Thank you for your ongoing dedication to safety on our roadways!</p> <p>Sincerely, Will Wlizio</p>	<p>Pedestrian safety is a strategic focus area of the SHSP with multiple action-oriented strategies. Leading pedestrian intervals and increasing funding for pedestrian infrastructure are tactics for Years 1-2. Decisions on right turn on red prohibitions are currently made on a case-by-case basis at the project level. Enforcement is an important component of the plan. Enforcement of parking restrictions is handled by various jurisdictions throughout the state.</p>	No change

ID	Source	Name	Comment	Response	Change to Document
19	Web	Liz Walton	<p>Please highlight throughout the need to support and prioritize the most vulnerable, particularly because the FAST analysis (pg 32) requires applying special rules. Some Core elements (pg 11) can directly improve vulnerable user safety (intersections, speed, inattentive).</p> <p>Not sure where it's best to include, but it would be very helpful to note briefly that any references to rumble strips, etc. must not degrade conditions for vulnerable users (people walking on roads where no walks exist/people on bicycles along MnDOT's State Bicycle Route Network (http://www.dot.state.mn.us/bike/district-bicycle-plans.html)). For example: page 14; T3.3 Incorporate shoulder, edge line, and centerline rumble strips in road designs THAT alert drivers of lane departing vehicles, WHILE PRIORITIZING THE MOST VULNERABLE USERS . Incorporate physical barriers into road designs to prevent collisions.</p> <p>pg 17. Consider stronger language toward the most vulnerable. For example, replace the word "incorporate" with "prioritize. T1.2 Incorporate transit, bicyclists, and pedestrians in intersection design. Provide facilities to accommodate people walking, rolling, and bicycling to limit conflicts with vehicles.</p> <p>pg 18. Under STRATEGY 3. IMPROVE ROAD DESIGN AND SPEED LIMIT SIGNING, include at least a brief reference to the most vulnerable, land use (tech memo 18-07-TS-05), and to PBPD (http://www.dot.state.mn.us/pbpd/). Perhaps in T3.1 Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds BASED ON LAND USE. Use road diets where appropriate.</p> <p>pg 19. T1.1 See above comment regarding rumble strips, etc. Consider similar language here.</p> <p>pg 21. Consider more references to partnerships and planning for increased transit/ non-motorized use. For example: T4.1 Increase PLANNING and funding to make community-based mobility options more AVAILABLE AND accessible, especially in rural areas.</p> <p>pg 22. Strongly throughout, refer to land use/land use tech memo. For example: T2.3 BASED ON LAND USE, Design roads and facilities for pedestrians, such as sidewalks, mid-block breaks, and bump outs. Identify areas with inadequate pedestrian facilities that could be improved, including in rural areas or on tribal lands. Provide the appropriate number of safe pedestrian crossings to accommodate</p>	<p>The plan has a strategic focus area to address pedestrian crashes. People walking and rolling are referenced in multiple other focus areas, including in intersections T2.1. Decisions about rumble strip design are made at the project level.</p> <p>The work zone focus area includes tactic T3.3 Maintain accessible pedestrian routes with Alternative Pedestrian Routes and Temporary Pedestrian Access Routes and provide clear bicycle detour routes. Protect pedestrian routes if they are detoured into the roadway.</p>	<p>On page 17, tactic T2.1 now states, "Prioritize transit, bicyclists, and pedestrians in intersection design. Provide facilities to accommodate people walking, rolling, and bicycling to limit conflicts with vehicles."</p> <p>On page 18, added "based on land use" and "Performance Based Practical Design" to T3.1. The tactic now states "Use Performance Based Practical Design geometric elements and traffic calming techniques to design roads for appropriate speeds based on land use. Use road diets where appropriate."</p> <p>On page 22, added "Based on</p>

ID	Source	Name	Comment	Response	Change to Document
			<p>pedestrian needs.</p> <p>pg 22. Under STRATEGY 2 PROMOTE POLICY CHANGES THAT IMPACT PEDESTRIAN SAFETY. If MN will ever really achieve Vision Zero, it's time to prioritize the most vulnerable. Create a new bullet: T3.4. Prioritize the most vulnerable user in all policies, practices, and designs.</p> <p>pg 24. Under STRATEGY 4 DESIGN SAFER WORK ZONES. Add a reference to prioritizing the most vulnerable in all work zones/all phases.</p>		<p>land use” to T2.3. Tactic now states, “Based on land use, design roads and facilities for pedestrians, such as sidewalks, mid-block breaks, and bump outs.”</p>
27	E-mail	Chad Ellos, Hennepin County	Consider adding a section for bicycles with specific tactics.	<p>Bicyclists are included in the Connected focus area grouping. The Connected focus areas represent a smaller portion of crashes compared to other focus areas, but most crashes are correlated with other focus areas. Crashes in these focus areas are addressed through strategies and tactics in the Core and Strategic focus areas. Bicyclists are included in strategies and tactics across multiple focus areas.</p>	No change
28	E-mail	Jennifer Hager, City of Minneapolis	In the pedestrian section under the education strategy (page 22), we suggest including an action for incorporating more pedestrian safety items into required drivers’ education and testing.	<p>Thank you for your comment. The Minnesota Department of Public Safety Driver and Vehicle Services Division has statutory authority to oversee driver training in Minnesota. They are continually looking to improve driver’s education for safety.</p>	No change
29	E-mail	Heidi Schallberg, Metropolitan Council	As some of the most vulnerable travelers (in addition to pedestrians), bicyclists should be a higher priority within this safety plan. The plan explains why bicyclists are categorized as a connected focus area in relation to the data remaining steady and states that strategies and tactics in Core and Strategic focus areas will help address bicyclists. To help emphasize this need, tactics should explicitly address bicyclists where	<p>Bicyclists are included in the Connected focus area grouping. The Connected focus areas represent a smaller portion of crashes compared to other focus areas, but most crashes</p>	<p>On page 22, added “and curb ramps” and “or rolling” to tactic T2.1 which now states, “Expedite</p>

ID	Source	Name	Comment	Response	Change to Document
			<p>possible to ensure this focus carries throughout this work. Some of our following comments make suggestions for doing this.</p> <p>On page 19, for tactic T1.1, suggest adding the new sentence or something similar in bold. “Install rumble strips and mumble strips on centerlines and edges of roads, especially along two lane roadways, to tactically warn drivers if their vehicles leave the desired travel area. These strips should be designed for safe use by bicyclists.”</p> <p>On page 22, suggest adding wording in bold for T2.1: “Expedite maintenance of sidewalks and curb ramps to deter people from walking or rolling in the road.” Curb ramps are critical for people with disabilities and are sometimes overlooked.</p> <p>13. Suggest adding wording in bold for T2.2: “Provide appropriate waiting and crossing time at signalized/active crossings, especially for older adults who may need more time to cross. Consider timing strategies to better accommodate pedestrian needs, including signals using pedestrian recall rather than actuation.” Long wait times can increase the possibility that pedestrians will take more risks to cross, especially in situations connecting to transit. Older adults (referenced as special focus on page 32 of this plan) may need more time to cross; calling this out helps tie the special focus concerns into the plan content.</p> <p>14. For T2.3, suggest addition in bold: “Provide the appropriate number of safe pedestrian crossings at convenient intervals to accommodate pedestrian needs.” For T2.6, please add transit as a consideration. Suggested wording in bold. “Improve lighting around pedestrian facilities to increase pedestrian visibility, including near transit stops and in rural areas.”</p> <p>16. For T3.1, pedestrian facilities should be listed first before safety campaigns.</p> <p>17. For T3.3, add regional levels. (“Develop pedestrian plans and Complete Streets plans at regional and local levels.”)</p> <p>18. On page 24, add wording in bold to T3.3: “Maintain accessible pedestrian routes with Alternative Pedestrian Routes and Temporary Pedestrian Access Routes and provide clear and direct as possible bicycle detour routes.”</p>	<p>are correlated with other focus areas. Crashes in these focus areas are addressed through strategies and tactics in the Core and Strategic focus areas. Bicyclists are included in strategies and tactics across multiple focus areas. Decisions about rumble strip design are made at the project level. Intersection strategies related to pedestrians focus on providing good access and addressing pedestrian needs. Specific intersection design decisions are made at the project level. Pedestrian and bicycle detour guidance is included in the Temporary Pedestrian Access routes and other construction guidance. Clear and direct detours are included in that guidance.</p>	<p>maintenance of sidewalks and curb ramps to deter people from walking or rolling in the road.”</p> <p>On page 22, added “at regional” to tactic T3.4 which now states, “Develop pedestrian plans and Complete Streets plans at regional and local levels.”</p> <p>On page 22, added “near transit stops” to tactic T2.6 which now states, “Improve lighting around pedestrian facilities to increase pedestrian visibility, including near transit stops and in rural areas.”</p>

Category: Specific Project

ID	Source	Name	Comment	Response	Change to Document
3	Web	Daniel Waters	<p>Please review how to determine a safe on-ramp to freeway length. For example, a 600 ft ramp from S Lexington to S 35W isn't just inadequate - it's very dangerous. In my opinion, the ramp should be closed except for morning rush hour when the lights can sequence vehicles entering the freeway.</p> <p>In Blaine, the on-ramp from Lexington Ave. South to Hwy 35W South exceeds the acceptable length by 20 feet. The ramp is 600 ft. long while the acceptable minimum length is 580 ft. The current ramp was constructed when the Lexington bridge was only two lanes. Today it is eight lanes wide and carries several times more traffic.</p> <p>A specific problem happens when the lights near the bottom of the ramp are yellow. From both northbound Lexington and southbound Lexington there are two lanes of traffic which are expected to merge while driving down the on-ramp before cars enter the freeway.</p> <p>What happens is that:</p> <ol style="list-style-type: none"> 1) the two lanes on top, 2) plus the requirement to merge before the freeway, 3) plus the short ramp length of only 600 ft, 4) plus the speed of traffic on the freeway outside of rush hours being between 70 mph and 80 mph, 5) plus not having any visibility as to what vehicles are approaching because the bridge is so close to the merge point, sets up a requirement by each driver to race down the ramp - not for the sake of being first - but for the sake of being safe! They are safer being first because they need to go from 0 to 75 mph in a very short distance with no visibility as to what vehicles are approaching in the right lane of the freeway. Many cars use the shoulder for another several hundred feet to get up to a speed where they can merge safely. <p>I'm tired of racing down that ramp and a few years ago decided to stop using it. The on-ramp at 95th Avenue S to 35W S is a very good example of what should also exist at Lexington.</p> <p>Thank you! Dan Waters</p> 	<p>Thank you for your comment. The SHSP is not a project-specific plan. This comment will be shared with relevant MnDOT District staff.</p>	No change
6	Web	Lisa Wichman	<p>The Dept of Transportation seems to spend a lot of time and effort on studies, surveys, and putting together very pretty reports and presentations. No where do I find how they are going to influence law enforcement or bodies of authority to enforce the laws we already</p>	<p>The Highway 65 corridor is currently undergoing a safety and mobility corridor study to</p>	No change

ID	Source	Name	Comment	Response	Change to Document
			<p>have in place. If we are truly facing billions of dollars in surplus, why aren't you at the legislature begging for this money to ramp up programs and add traffic law enforcement? I live in Blaine. As you know, Highway 65 has been overlooked for many, many years. It's known as "DEATH ALLEY" in my neighborhood. It's avoided at all costs. Residential areas have become secondary highways - my road is called "Highway 99th" now. It used to be a quiet neighborhood, now we have rush hour traffic 24-7 going through our neighborhoods to avoid 65 and it's only getting worse. SPEND OUR SURPLUS ON ACTUAL BRIDGES AND OVERPASSES. THE 4 SUGGESTED BAND-AID SOLUTIONS ARE A COMPLETE JOKE! SPEND THE MONEY AND INVEST IN LONG TERM FIXES!! It's our tax dollars, spend it right the first time or give it back. Bring back "red light" cameras. Look at the statistic of crashes on 65 and 99th, 109th, 117th, all the way north. I can guarantee you that most to all crashes are due to running red lights or cell phone talkers. It's completely bogus that it's a violation of our privacy rights (or whatever the excuse was to shut this program down). Baloney! Driving is a privilege, not a right. Don't break the law and you won't have to worry about a photo of your license plate and violating your "right to privacy".</p>	<p>determine future improvements on the corridor. Comments specific to that corridor can be given as part of that process.</p> <p>The SHSP also includes a strategy to explore the potential for red light running enforcement cameras.</p>	
23	Web	Lewis Davis	<p>I don't know if I'm misunderstanding what this comment form is for it not. A round about (even though I don't like the idea, means I'd have to slow down more) would be nice at the intersection of highway 2 and highway 194.</p> <p>It can't be a shotty one like hwy 33 and I 35.</p> <p>Need one that literally forces people to slow down to a proper speed.</p> <p>Once this is completed. A turn lane from East bound hwy 194 onto Jackson rd .5 miles east of hwy 2 and 194 would be a good asset.</p>	<p>Thank you for your comment. The SHSP is not a project-specific plan. This comment will be shared with relevant MnDOT District staff.</p>	No change

Category: Speed

ID	Source	Name	Comment	Response	Change to Document
27	E-mail	Chad Ellos, Hennepin County	<p>For speeding, T2.4 Consider including 'automated enforcement for school bus stop arm infractions' as well (cameras on school buses). T3.2 Consider updating the process / methodology for determining authorized speed limits that relies heavily (mostly) on the 85th percentile speed data collected - can drivers alone be trusted to determine / set a comfortable and safe speed that is acceptable for all users of the right of way? NCUTCD has made recommendations for the next MUTCD update regarding the statement of setting speed limits, "Remove the guidance that speed limits in speed zones be within 5 mph of the 85th percentile speed"</p>	<p>The Speeding focus area includes tactic T3.2 "Use appropriate speed limits that account for roadway design, traffic, land use, and context." The language is broad to allow for flexibility in setting speed limits and potential future changes to guidance.</p> <p>The Local Road Research Board is currently conducting study</p>	<p>On page 22, added tactic T3.3 "Explore school bus stop arm violation camera enforcement."</p>

ID	Source	Name	Comment	Response	Change to Document
				2019-060 Impact of Speed Limit Changes on Urban Streets. Results from this study will be incorporated into future speed limit guidance	
28	E-mail	Jennifer Hager, City of Minneapolis	<p>We support the focus on speed. We suggest that the heading on page 18 be changed from “speeding” to “speed” to recognize that speed is a factor in crashes even if not speeding over the current speed limit.</p> <p>We suggest adding to T3.2 on page 18: 1) a specific recognition of pedestrian and bicyclist safety; 2) a recognition that MnDOT is doing a study around speed limits; and 3) a recognition that national guidance on setting safe urban/suburban non-highway speed limits is evolving to using methods beyond the 85th percentile speed. A 2017 NTSB report on reducing speed-related crashes includes recommendations related to urban speed limits that has led to recommended changes in speed limit guidance in the MUTCD from the National Committee on Uniform Traffic Control Devices.</p> <p>We suggest adding an action to create guidance for local communities who may be considering new safety-focused speed limits. With the new legislative authority, many cities are considering speed limits, but some state guidance would make that process easier.</p>	<p>The Speeding focus area is targeted primarily on driver behavior of driving above the speed limit. The focus area also includes tactics on traffic calming and appropriate roadway design to reduce speeds.</p> <p>The Speeding focus area includes tactic T3.2 “Use appropriate speed limits that account for roadway design, traffic, land use, and context.” The language is broad to allow for flexibility in setting speed limits and potential future changes to guidance.</p> <p>The Local Road Research Board is currently conducting study 2019-060 Impact of Speed Limit Changes on Urban Streets. Results from this study will be incorporated into future speed limit guidance.</p>	No change

Category: Traffic Safety Culture

ID	Source	Name	Comment	Response	Change to Document
8	Web	Shawn Schloesser	Pg 13. Traffic Safety Culture: What is the benefit of Minnesota participating in the Montana traffic safety culture pooled fund study? Did you mean Minnesota's traffic safety culture pooled fund study?	The Traffic Safety Culture is referencing Minnesota's traffic safety culture pooled fund study. The University of Montana	Removed Montana from Traffic

ID	Source	Name	Comment	Response	Change to Document
				administers the program. This will be clarified in the text.	Safety Culture tactic on page 13.
12	Web	Jeff Lenz	3) On page 13, TSC 2 states to increase coordination between programs in state - I feel we need to be working with other states more closely to see what is working there also.	Thank you for your comment.	No change
27	E-mail	Chad Ellos, Hennepin County	Consider working with the Bicycle Alliance of Minnesota to build the reach and effectiveness of their People Friendly Driver Program. https://www.bikemn.org/education/people-friendly-driver-pilot-program . Consider adopting or partnering with the Bicycle Alliance of Minnesota Walk! Bike! Fun! Pedestrian and Bicycle Safety Curriculum. https://www.bikemn.org/education/walk-bike-fun .	Thank you for comment. When implementing the strategies and tactics related to walking and biking education, the Bicycle Alliance of Minnesota will be a key partner.	No change
29	E-mail	Heidi Schallberg, Metropolitan Council	We support tactic TSC 5 to initiate data collection and analysis to identify high priority traffic safety risks facing Minnesota's diverse and underserved populations. Suggest edits to this tactic to specifically call out the need for data on race. One consideration with equity is racial disparities related to policing. The Council's Transportation Policy Plan for the Minneapolis-St. Paul region includes a safety strategy that "The Council and its regional transportation partners will ensure that police and public safety agency enforcement programs and actions on the region's transportation system do not create or perpetuate racial inequities." It is our understanding that Minnesota does not require local police departments to collect traffic stop data including race, so therefore there is currently no consistent database to use for routine analysis on potential racial disparities. The most recent work we found at the state level on racial profiling was done in 2003 at the request of the state legislature.	Local traffic enforcement is conducted by multiple jurisdictions throughout the state. This suggestion is outside of the scope of the SHSP. However, MnDOT is currently exploring the impact of transportation on equity in Minnesota and is looking to incorporate equity considerations more fully in the upcoming Statewide Multimodal Transportation Plan.	No change
30	E-mail	Dan McCormick, Carver County	In the area of traffic safety culture, it seems there could also be more done. If the various traffic safety partners would review and adopt, and then commit to and practice certain key safety activities, this could springboard and extend a culture across a larger area and in a unified way. Areas of interest could be always obeying the speed limit; yielding and stopping for pedestrians at marked crosswalks; giving bicyclists a clear 3-foot or more passing space and respect. Or areas of interest could include annual projects focused on core areas of emphasis by all counties or agencies, perhaps supported by TZD or MnDOT or FHWA.	Thank you for your comment. No response needed.	No change

Category: Unbelted Occupants

ID	Source	Name	Comment	Response	Change to Document
12	Web	Jeff Lenz	6) On page 20, T1.6 We need to get the teen perspective on driving hazards as well as having teen oriented TZD meetings. Their perspective is critical to changing the upcoming drivers habits. 7) On page 20, T3.2,3 Work with schools, daycare providers, clinics and hospitals on proper child passenger safety seats, to make sure everyone has their car seats in correctly or has proper car seats.	Thank you for your comment.	No change

Category: Work Zones

ID	Source	Name	Comment	Response	Change to Document
12	Web	Jeff Lenz	8) On page 24, many of these work zones practices are currently on going at least at MnDOT, however many counties and cities do not require near as much traffic control measures. Push to make all work zones comply to a higher standard. Many good points, some that are just not practical from a design and maintenance perspective.	A strategy may be on-going for some agencies but not for others. The timeframes for implementation may vary from agency to agency.	No change
29	E-mail	Heidi Schallberg, Metropolitan Council	T3.4 about using phone apps for alerts when vehicles are moving seems to encourage phone use while driving, encouraging distraction. This seems to work against other safety concerns. Suggest deletion or at a minimum rewrite for clarification.	The intent of the alerts would be to notify drivers with basic messaging that would limit distraction and bring heightened awareness of the work zone.	No change

Category: Wildlife

ID	Source	Name	Comment	Response	Change to Document
2	Web	Chris Smith	Consider adding wildlife-vehicle collisions (WVCs) as a focal area as they comprise over 10% of all fatalities and serious injuries between 2014-2018. On rural roads that figure is higher. Minnesota also ranks in the top 10 states for deer-vehicle collisions.	Based on Minnesota Crash Facts for 2014-2018, wildlife-vehicle collisions were 1.5% of fatal crashes and 1.2% of any injury crash. The new MnCRASH data system will have better wildlife data. MnDOT will evaluate with multiple years of new crash data.	No change

Category: Younger Drivers

ID	Source	Name	Comment	Response	Change to Document
8	Web	Shawn Schloesser	Pg 23, Increase Public Awareness to Improve the Safety of Young Drivers: Why translate the drivers manual into Russian rather than Spanish or any of the multiple African languages?	The Minnesota driver’s manual is currently translated into Spanish. The tactic already suggests translating the driver’s manual to Somali, Hmong, and Vietnamese.	On page 23, added footnote which states, “The Minnesota Driver’s Manual is currently translated into Spanish in addition to English.”
27	E-mail	Chad Ellos, Hennepin County	For Younger Drivers T1.5, Mention languages currently translated into (Spanish, ...).	Change made	On page 23, added footnote which states, “The Minnesota Driver’s Manual is currently translated into Spanish in addition to English.”



**Carver County
Public Works**

11360 Highway 212, Suite 1
Cologne, MN 55322

March 20, 2020

Minnesota Department of Transportation –
ATTN: Strategic Highway Safety Plan

Re: **Comments on Draft 2020-2024 Strategic Highway Safety Plan**

Dear MnDOT and Highway Safety Stakeholders:

Thank you for the opportunity to comment on the subject plan. Overall the Strategic Highway Safety Plan is an excellent document and umbrella type system to help organize and lead other or subordinate state, county, and city plans and programs.

Comments we would share at the County-level are how to best provide implementation standards and direct, independent or more focused funding toward safety elements and projects, especially core focus areas of emphasis noted in the plan and areas of concern at the County level.

We suggest the plan or companion program should recognize and better coordinate a system where traffic safety fundamentals and best practices would be more systematically incorporated in as many projects as possible, and in a way that is consistently balanced to all 87 counties or geographic areas, like the Metro area.

In the same vein, we suggest the plan or companion program should recognize and better coordinate existing future County Roadway Safety Plans. In some sense or at least in general, it seems like Counties are on their own for implementation, but perhaps more could be done to partner or complement MnDOT and/or local highways and facilities to tackle more complex locations or areas of concern together as a larger, stronger team. High Risk Rural Roads are another big concern of Carver County and likely other counties. Highways like Hwy 12, Hwy 14, and Hwy 212 where several fatalities continue to occur on older, 2-lane rural highways seem like they should be receiving more attention and resources. We believe MnDOT should consider committing more resources or requirements to reduce death rates on rural roads of all classifications.

The TZD Program, while laudatory and open to engineering, seems to be more focused on enforcement and enforcement-led education and outreach, and grant programs related thereto. The 4E's noted in the draft plan and in the TZD traffic safety program could be made stronger by more dedicated resources to Engineering and a 5th "E" of Evaluation. If for example, there are fatal or high injury crashes of any mode in a County, what is MnDOT and the County or Cities going to do? Is there a true "5E" level, all alert focus and funds available on actual TZD efforts? What happens if a fatal traffic crash occurs on a MnDOT highway in a County?

One idea that perhaps the draft plan should consider is incorporating more formal TZD principles and programs at all levels of state, county and city, and in a more formal or rigid requirement or process to act promptly, and incorporate safety measures and crash reduction factors of all ranges in the 5Es.

Perhaps a more formal Safety Certification Process like WisDOT could be considered? The understanding there is that the Safety Certification Process (SCP) is a step-by-step process of determining whether safety improvements are scoped out early in the process and reviewed as to whether they should be included on a

CARVER COUNTY

project by screening, quantifying safety mitigation alternatives, monetizing the resulting safety benefits, completing benefit-cost comparisons of the mitigation alternatives, and documenting decisions and judgements throughout the process. Another potential system could follow the flagging thresholds like MnDOT's ADA Technical Memorandum 18-04-OP-01, where like ADA, safety elements would be made a clearer standard requirement in various levels of projects, including State Aid and Rehabilitation projects or the like.

Related to this, how do design standards that may include nominal safety elements go further to include more proven safety countermeasures that are supported by safety performance functions and crash reduction factors. The HSIP program is a welcome and wonderful program, but is there a way to add the HSIP type process to as many projects as possible on a larger system-wide basis in other ongoing infrastructure projects?

In the area of traffic safety culture, it seems there could also be more done. If the various traffic safety partners would review and adopt, and then commit to and practice certain key safety activities, this could springboard and extend a culture across a larger area and in a unified way. Areas of interest could be always obeying the speed limit; yielding and stopping for pedestrians at marked crosswalks; giving bicyclists a clear 3-foot or more passing space and respect. Or areas of interest could include annual projects focused on core areas of emphasis by all counties or agencies, perhaps supported by TZD or MnDOT or FHWA.

As noted, we appreciate all the work on the subject plan, and appreciate having the chance to share comments and ideas.

Sincerely,

Dan McCormick PE PTOE | Transportation Manager
Carver County Public Works
11360 Highway 212, Suite 1, Cologne, MN 55322
O: 952.466.5200 | D: 952.466.5208
M: 952.500.2846 | F: 952.466.5223
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Metropolitan Council (MTS) Comments on Draft 2020-2024 Strategic Highway Safety Plan (SHSP)

Overall Comments

1. It would be helpful to add an index of the tactics (at least those marked with check marks for the 5 year plan) organized by the 4 Es as a cross reference to help show what the priorities are in each of those areas.
2. Although equity is referenced in relation to the 6 Es used in Safe Routes to School (on page 22), there is little mention or consideration of equity overall. This should become an explicit consideration for traffic safety work, and we would encourage adding equity as an “E” in future versions of this plan.
3. As some of the most vulnerable travelers (in addition to pedestrians), bicyclists should be a higher priority within this safety plan. The plan explains why bicyclists are categorized as a connected focus area in relation to the data remaining steady and states that strategies and tactics in Core and Strategic focus areas will help address bicyclists. To help emphasize this need, tactics should explicitly address bicyclists where possible to ensure this focus carries throughout this work. Some of our following comments make suggestions for doing this.

Introduction

4. In the fifth sentence on page 4, suggest adding the following language in bold. “**In addition to the emotional impacts, these deaths and** injuries cost Minnesotans over \$3.6 billion across five years.”

Crash Data

5. MnDOT should consider adding data related to Figure 7 Minnesota Death and Serious Injury Crashes by Focus Area (page 9) for the Twin Cities and greater Minnesota, in addition to the statewide numbers shown. When this draft plan was presented to Metropolitan Council committees, key differences in these were mentioned (such as the Twin Cities being higher for pedestrians and bicyclists, while lower for lane departures), but these important distinctions should be discussed in this plan.

Traffic Safety Culture

6. We support tactic TSC 5 to initiate data collection and analysis to identify high priority traffic safety risks facing Minnesota’s diverse and underserved populations. Suggest edits to this tactic to specifically call out the need for data on race. One consideration with equity is racial disparities related to policing. The Council’s Transportation Policy Plan for the Minneapolis-St. Paul region includes a safety strategy that “The Council and its regional transportation partners will ensure that police and public safety agency enforcement programs and actions on the region’s transportation system do not create or perpetuate racial inequities.” It is our understanding that Minnesota does not require local police departments to collect traffic stop data including race, so therefore there is currently no consistent database to use for routine

analysis on potential racial disparities. The most recent work we found at the state level on racial profiling was done in 2003 at the request of the state legislature.

Inattentive Drivers

7. On page 14, suggest adding the wording in bold to T3.4: “Support the transition to autonomous vehicles and other emerging motor vehicle technology to reduce human error, **especially in interactions with people walking, rolling, or bicycling.**”

Intersections

8. On page 17, earlier drafts of tactic T3.1 included “Move away from level of service focused analysis.” We support the inclusion of this original language and suggest it be added back in.

Speeding

9. On page 18, we support the potential for automated speed enforcement in Minnesota, especially in helping to improve traffic safety while minimizing risks related to implicit bias and human error related to policing.

Lane Departure

10. On page 19, for tactic T1.1, suggest adding the new sentence or something similar in bold. “Install rumble strips and mumble strips on centerlines and edges of roads, especially along two-lane roadways, to tactically warn drivers if their vehicles leave the desired travel area. **These strips should be designed for safe use by bicyclists.**”

Older Drivers

11. On page 21, for tactic T4.1, suggest adding the wording in bold. Coordinated plans have been done across the state that identify work needed to improve and promote these options for older adults and people with disabilities. Funding is critical, but other work can be done with increased coordination as well.

“Increase funding **and coordination** to make community-based mobility options more accessible, especially in rural areas.”

Pedestrians

12. On page 22, suggest adding wording in bold for T2.1: “Expedite maintenance of sidewalks **and curb ramps** to deter people from walking **or rolling** in the road.” Curb ramps are critical for people with disabilities and are sometimes overlooked.
13. Suggest adding wording in bold for T2.2: “Provide appropriate **waiting and** crossing time at signalized/active crossings, **especially for older adults who may need more time to cross.** Consider timing strategies to better accommodate pedestrian needs, **including signals using pedestrian recall rather than actuation.**” Long wait times can increase the possibility that pedestrians will take more risks to cross, especially in situations connecting to transit. Older adults (referenced as special focus on page 32 of this plan) may need more time to cross; calling this out helps tie the special focus concerns into the plan content.
14. For T2.3, suggest addition in bold: “Provide the appropriate number of safe pedestrian crossings **at convenient intervals** to accommodate pedestrian needs.”

15. For T2.6, please add transit as a consideration. Suggested wording in bold. “Improve lighting around pedestrian facilities to increase pedestrian visibility, including **near transit stops and** in rural areas.”
16. For T3.1, pedestrian facilities should be listed first before safety campaigns.
17. For T3.3, add regional levels. (“Develop pedestrian plans and Complete Streets plans at **regional and** local levels.”)

Work Zones

18. On page 24, add wording in bold to T3.3: “Maintain accessible pedestrian routes with Alternative Pedestrian Routes and Temporary Pedestrian Access Routes and provide clear **and direct as possible** bicycle detour routes.”
19. T3.4 about using phone apps for alerts when vehicles are moving seems to encourage phone use while driving, encouraging distraction. This seems to work against other safety concerns. Suggest deletion or at a minimum rewrite for clarification.

Commercial Vehicles

20. On page 25, add new tactic under Support New Vehicle Technology: T4.2 Add side underride guards to trucks to protect pedestrians, bicyclists, and motorcyclists. As background: New York City is one example of adding this equipment to their trucks as part of their Vision Zero program. Background links for more info on why this is important:
<https://usa.streetsblog.org/2016/10/31/why-american-trucks-are-so-deadly-for-pedestrians-and-cyclists/>
<https://www.volpe.dot.gov/event/protecting-pedestrians-and-bicyclists-truck-side-guards>

Implementation and Evaluation

21. Specify regional agencies as stakeholders where possible. On page 27 there are two opportunities to do so. “Full and effective SHSP implementaton relies on counties, cities, **regional**, and other governmental agencies...” Also on this page in sidebar: “The SHSP strategies and tactics were informed by several plans and in turn are intended to inform state, **regional**, local, organization, and coalition plans at their next update.”
22. We appreciate the clear inclusion of MTPs and TIPs in Figure 9 on page 30 showing their relation to state plans and programs.
23. As part of evaluation data collection and analysis, the plan should mention reviewing how to most efficiently invest in safety infrastructure related to fatalities and serious injuries. For example, MnDOT could analyze the amount of safety funding being spent per railroad crossing fatality vs. per intersection fatality.

March 20, 2020

Minnesota Toward Zero Deaths Leadership Team
RE: Comments on draft MN Strategic Highway Safety Plan

Dear Leadership Team,

We appreciate the thoughtful data-driven approach to the draft 2020-2024 Minnesota Strategic Highway Safety Plan. A few specific comments on the draft:

- We support having a long-term goal to eliminate deaths and serious injuries on Minnesota roadways and aggressive, but achievable short-term goals.
- We support the focus on speed.
 - We suggest that the heading on page 18 be changed from “speeding” to “speed” to recognize that speed is a factor in crashes even if not speeding over the current speed limit.
 - We suggest adding to T3.2 on page 18: 1) a specific recognition of pedestrian and bicyclist safety; 2) a recognition that MnDOT is doing a study around speed limits; and 3) a recognition that national guidance on setting safe urban/suburban non-highway speed limits is evolving to using methods beyond the 85th percentile speed. A [2017 NTSB report](#) on reducing speed-related crashes includes recommendations related to urban speed limits that has led to [recommended changes in speed limit guidance in the MUTCD](#) from the National Committee on Uniform Traffic Control Devices.
 - We suggest adding an action to create guidance for local communities who may be considering new safety-focused speed limits. With the new legislative authority, many cities are considering speed limits, but some state guidance would make that process easier.
- We support including actions related to automated enforcement. For T4.4 on page 17 and T2.3 on page 18, we suggest expanding the research to include “... and recommending systems around potential use of automated enforcement, including technical, legal, privacy, and equity considerations.” The safety benefits of automated enforcement are well documented, but there are a lot of unanswered questions with respect to implementation details that would need to be answered before a pilot program around schools, work zones or a general program could be implemented.
- In the pedestrian section under the education strategy (page 22), we suggest including an action for incorporating more pedestrian safety items into required drivers’ education and testing.
- In the commercial vehicles section (page 25), we appreciate the strategy to support new vehicle technology, but suggest expanding that to include studying the potential ways to get more safety improvements beyond just platooning. One example is that NTSB has been looking at technology to reduce blind spots, which are especially challenging for trucks and pedestrians and bicyclists.

Thank you for your work to make streets and highways safer for everyone.

Sincerely,



Jenifer Hager, Director of Transportation Planning and Programming
City of Minneapolis Public Works Department