



December 17, 2021

U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

**Reference: U.S. DOT Strategic Plan Request for Comments - Docket No. DOT-OST-2021-0140**

To Whom It May Concern,

The U.S. DOT Strategic Plan 2022-2026 comes at a critical time for our nation and its infrastructure. With the integration of emerging technologies into the transportation system – from the trialing of connected and automated vehicles and unmanned aerial mobility to the growing use of data analytics to enhance safety and efficiency on our roadways – we have the opportunity and challenge to plan for and integrate solutions that support the evolution of mobility. How we fund projects that are forward thinking, equitable, and focused on a more integrated and holistic transportation system that prioritizes both accessibility and digital connectivity will be important to consider as next generation infrastructure needs are considered, planned for, and funded.

The COVID-19 pandemic brought into clear view how mobility inequities impact not only access to work but also groceries and health care. It re-enforced that safe, affordable, reliable, and convenient mobility options are equalizers that help people access good jobs, healthy foods, and social connections. The resilience of our transportation system is equally important as ensuring access to mobility options is done through an equity-focused lens. With the passage of the Infrastructure Investment and Jobs Act, U.S. DOT has a unique opportunity to use its Strategic Plan to shape the outcomes of projects so they address the future transportation needs of the United States and mitigate the impacts of past transportation decisions, including increased emissions, congestion, and the division of communities.

Stantec is excited and motivated by what it sees as the second mobility evolution that is currently unfolding on a national and global scale. The first was the integration of the automobile; now, we are seeing the integration of demand-responsive mobility solutions, automated technologies for both the movement of people and goods, shared mobility investments, emerging mobility solutions that look beyond just surface transportation, and alternative fuel sources. The question becomes – how do we steer this evolution towards realizing a more efficient, inclusive, sustainable, and safer transportation system to support the next generation of mobility?

We are inspired to see that U.S. DOT is prioritizing equity, sustainability, and innovation in its Strategic Plan 2022-2026. As a company, we view it as our responsibility to design infrastructure that best serves the communities in which we are privileged to work. Our on the ground experience includes the entire project development process, from policy and strategic planning, to design, construction management and implementation. We have seen how breaking down silos and challenging the existing compartmentalized approach to how agencies plan for, design, and implement transportation projects creates barriers to incorporating new and innovative ideas into transportation planning and project approach, in addition to cost inefficiencies. Overcoming silos and barriers to move beyond the status quo will take rethinking the roles and responsibilities of the public and private sectors around the transportation system and its ongoing evolution. Our comments expressed herein are informed by our on-the-ground perspectives and views on how the U.S. DOT and its partner agencies can best support the important goals presented in its Strategic Plan 2022-2026.

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## Introduction to Smart(ER) Mobility – Stantec’s vision for more equitable and resilient mobility systems.

As part of our commitment to planning and designing high quality transportation systems, Stantec has developed ten principles to guide our work towards a Smart(ER) transportation system that focuses on looking through [Sm]art + [E]quity + [R]esilience lenses.

These ten principles are:

- **People First** - Policy making, budget allocation, and design must prioritize people over vehicles. This means focusing on safety and leveraging data responsibly to support access to mobility options through infrastructure investments with system resilience in mind.
- **Inclusive** - Everyone deserves to have access to mobility options that are safe, reliable, convenient, affordable, and comfortable, which must be informed by inclusive community engagement.
- **Innovative** - Innovation must be more than just technology; it is also rethinking governance, processes, and approaches to how we plan, design, procure, and engage with decisionmakers and the community.
- **Responsive** - Innovation-minded projects must go beyond just urban settings; creating context-specific opportunities for suburban, rural, and tribal projects, where access to transportation is critical, is necessary for an equitable and resilient mobility ecosystem.
- **Clean** - Solutions must move towards not emitting pollutants or greenhouse gases at the point of use and in the production of energy to meet zero-emissions targets.
- **Shared** - Shared mobility must be incentivized, starting with public transit, where possible, while also fostering partnerships focused on demand-responsive solutions.
- **Multimodal** - Investments must be prioritized to provide diverse modal options, particularly considering how cultural norms, demographics, and ability levels can influence mode choice.
- **Value-Based** - Transportation decisions must consider the societal and climate impacts of building and maintaining infrastructure, as well as user access to, and understanding of, social benefits from offering sustainable modal choices.
- **Implementable** - Projects must merge creative and innovative solutions with an actionable plan for implementation that considers existing infrastructure and access to funding.
- **Climate Adaptive** - Policy, planning, and design must evaluate climate change impacts to inform decision-making and ensure mitigation measures are integrated into mobility projects.

U.S. DOT is well-positioned to lead by example and support national transportation strategies that support the merging of equity, resilience, and innovation in future transportation projects.

Again, from an on-the-ground project experience perspective, below are specific comments addressing the U.S. DOT Strategic Plan that we hope will inform and support the successful implementation of the plan. Each of the comments below tracks the guiding principles included above as noted.

## What strategies or priorities should the U.S. DOT adopt to achieve the Department's strategic goals and objectives?

- As the U.S. DOT promotes more equitable transportation projects moving forward, there should also be a focus on rebuilding trust within communities that were adversely impacted by transportation systems in the past. This includes focusing on transportation projects which reconnect communities that were divided by interstates and rectifying historical funding disparities. Informing such a program focus will require well-funded, inclusive community engagement to be successful. [Inclusive, Innovative]

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- To reach climate and sustainability goals, U.S. DOT should prioritize projects and policies that look to shift the pattern of relying on personal vehicle ownership – whether gas or electric – toward space efficient, high-capacity modes. This requires overcoming silos to merge planning for housing development with incentives around shared mobility options, in addition to considering user incentives. One key opportunity is leveraging transit investments to support “first/last mile” solutions to enhance public transportation system resilience, access, and flexibility. [Clean, Shared, Multimodal]
- Agencies should be encouraged to allocate appropriate budget to community outreach so there are resources to complete high quality engagement with many community touchpoints to ensure an impactful discussion with the community. [Inclusive]
- For communities to truly feel the extent of the U.S. DOTs Operational Excellence, technical support should be available to state and local infrastructure owners so they have the tools available to tackle complex, transformative, and unconventional projects. These projects include highway removal, micromobility and microtransit integration, major transit investments and “first/last mile” partnerships, and formation of multi-discipline working groups that cross agency departments to maximize risk consideration and promote operational efficiencies. The goal should be to empower confidence, creativity, and reasonable risk. [Responsive, Innovative, Implementable]

#### How should U.S. DOT measure progress towards those priorities?

- All operational metrics should focus on the safe movement of people instead of vehicles. Improving level of service for pedestrians, cyclists, and transit, for example, is equally as important as improving level of service for individuals driving personal vehicles. U.S. DOT should develop baseline standards for people-focused metrics for evaluating transportation projects. [People Focused, Multimodal]
- Safety metrics should include all aspects of health and safety negatively impacted by reliance on personal vehicles, not just crash reductions. These may include health impacts associated with additional sedentary time, emissions, and lack of options to reduce impaired driving. [Clean, Value Based, Innovative, People First]
- Benefit cost analyses should be balanced to quantify benefits beyond personal vehicle travel time savings. U.S. DOT should consider funding additional research into quantifying the benefits of improved transit and bicycle infrastructure, in addition to transit dedicated infrastructure. [Value Based]

#### What emerging challenges or opportunities in transportation warrant additional U.S. DOT activities or investments?

- Many new transportation technologies exist in a regulatory gray area, which makes it difficult for local jurisdictions to make long-term plans to incorporate these technologies. The U.S. DOT should consider federal guidance on automated vehicle safety certifications, as well as federal guidelines, standards, and regulations relating to micromobility solutions. [Innovative, Shared, Multimodal]
- We are encouraged by the funding allocated to electric vehicle infrastructure in the Infrastructure Investment and Jobs Act, but reiterate an informed approach to EV charging infrastructure deployment. It will need to be more robust than the alternative energy corridors being considered. Considerations around equity and ensuring meaningful outreach and engagement with communities to ensure no one is left behind in the transition to alternative fuels will be critical. Also, supporting incentives that align design standards for new buildings and charging

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infrastructure will be important, in addition to technical support for helping communities around needed coordination with energy providers. [Clean, Responsive, Implementable]

- Federal best practices around interoperability and standards for the integration of various mobility providers into collaborative platforms are needed with a focus on national fare payment systems that provide seamless transitions from transit to demand-responsive mobility providers, particularly to support continued integration of “first/last mile” solutions. [Innovative, Implementable]
- As we encourage fewer personally owned vehicles, intercity transit will need to become a more reliable and efficient option. The U.S. DOT could explore creative options for providing cohesive regional transit options which cross jurisdictional boundaries and ensure the important connections between urban, suburban, rural, and tribal communities that are needed and critical towards an equitable transportation system. [Shared, Responsive, Multimodal]
- As the reliance on web-based solutions becomes more prevalent, internet and cellular access are becoming a necessity for travel. The U.S. DOT should continue evaluating and considering the growing convergence between mobility and broadband infrastructure. [Inclusive, Implementable, Value Based]
- Cell phone location data, and other major data collection sources, can be of great value for understanding and modeling mobility behaviors and trends. However, there needs to be consistent guidelines on data privacy and bias for these data sources to be evaluated against. Considering how the responsible and privacy-minded use of such tools and data can support better transportation planning should continue. [Inclusive, Innovative]
- Many transformative solutions will come from communities and state DOTs. The U.S. DOT should be supportive of new innovative approaches to project delivery and partnerships, and allowing funding to support these innovations. [Innovative, Value Based]

#### **How can U.S. DOT best coordinate its activities with Federal, State, local, tribal, labor, private sector, academic, non-profit, international, and other stakeholders?**

- The future of mobility will require close coordination among a variety of entities to implement initiatives that otherwise might seem too daunting. U.S. DOT should continue to explore innovative contracting and procurement methods that allow communities to think creatively and bring in private sector or non-profit help to achieve their goals. [Innovative, Implementable]
- As mobility and technology become more intertwined, it will be critical to break down institutional silos. We are glad that the DOT and DOE are jointly evaluating the impacts of electric vehicles. In a similar style, the U.S. DOT should work with Housing and Urban Development, Department of Commerce, and Department of Health to understand how decisions within each department impact personal and freight mobility. [People Focused, Value Based]

#### **How can U.S. DOT best utilize additional programs and authorities in the Infrastructure Investment and Jobs Act to accomplish the goals laid out in the strategic plan?**

- We encourage the U.S. DOT to think of additional alliances that can be created to break down silos and support the future of mobility. This includes ensuring equitable access to EVs and thinking beyond just replacing a combustion engine for an electrical powertrain, but also considering incentives for transitioning to shared and electric mobility. [Clean, Climate Adaptive]
- U.S. DOT could favor projects that use a DigOnce or SmartDig policy to minimize the cost and disruption to communities as communities try to accomplish parallel goals. [People First, Implementable, Value Based]
- The U.S. DOT can continue to support the establishment of centers of excellence across the country, but with the goal of merging mobility, land use, and planning to more efficiently identify

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and plan for next generation infrastructure needs. [Innovative, Responsive, Value-Based, Implementable]

### Summary

In summary, and based on its project experience working with communities and mobility implementation partners across the country, Stantec recommends a Strategic Plan that:

- Fosters collaboration and innovation to better serve our most vulnerable populations;
- Better measures and prioritizes infrastructure based on a holistic understanding of the value provided by access to safe, affordable, reliable, sustainable, and convenient transportation;
- Mitigates and adapts to reduce climate change impacts, and other environmental challenges, in addition to supporting the development of metrics around equity; and
- Provides technical assistance to transportation-focused agencies that support creative thinking to retool existing governance structures to support the next generation of mobility.

Thank you for your work developing a comprehensive and collaborative Strategic Plan and for the opportunity to provide comments. We look forward to and welcome being a resource for the U.S. DOT and other agencies to deliver a Smart(ER) Mobility future to the communities we work and live in.

Sincerely,



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