

The Delaware Valley Regional Planning Commission

Responses to Comments on the Draft FY 2019 Unified Planning Work Program

Comments from DVRPC Board Members

New Jersey Department of Transportation:

- A letter was received from NJDOT dated December 15, 2017.
- Response: Please see the attached correspondence for the comments and DVRPC's responses.

Pennsylvania Department of Transportation:

- A letter was received from PennDOT dated January 9, 2018.
- Response: Please see the attached correspondence for the comments and DVRPC's responses.

City of Philadelphia

- An e-mail was received on December 23, 2017 requesting additional funding via the pass-through programs.
- Response: DVRPC will receive an increase of \$110,000 in PL funding in FY 2019 through PennDOT and is able to share 50% of this increase with the counties, as requested. This should be considered as a one-time increase as there is no guarantee that DVRPC will receive additional PL funds in the future. This will increase the Supportive Regional Highway Planning Program total from \$628,000 to \$683,000 in FY2019. Table B and Table C in the document have been updated to reflect the new funding amounts for the PA Counties.

Comments from Various Organizations

The New Jersey Circuit Coalition

- A letter was received from the members of the New Jersey Circuit Coalition's steering committee dated January 5, 2018.
- Response: Please see the attached correspondence for the comments and DVRPC's responses.

The Bicycle Coalition of Greater Philadelphia

- An e-mail was received on December 18, 2017:
Can you tell me if the City of Camden submitted a bicycle and pedestrian design project (besides Get Healthy Camden) into the 2019 Work Program? And if so what were the reasons as to why it was rejected? Mr. John Boyle, Research Director
- Response: Yes, Camden did submit the Bike/Ped plan development work as a work program proposal for FY2019. This project is not included in the draft work program because of limited staff capacity. We received more proposed work than we can take on in the bike/ped area given other commitments, and continuation of the Healthy Community Master Plan work is also a high priority for Camden. This is a good project and we appreciate your support for it. We are still working with the city on other ways to potentially conduct this work.

Comments from General Public

Mr. Eric Hartman, Ph.D.

- An e-mail was received on December 24, 2017: I've just been reading through the FY19 work program. I'm writing with a public comment. As a resident of Delaware County, immediately adjacent to Montgomery County, I'd love to see more attention to bicycle trails that move through our neighborhoods and connect us safely with Philadelphia's biking infrastructure.
- Response: Thank you for your comment, and for your interest in bicycle connectivity improvements in our suburban counties. DVRPC plans for and supports these types of improvements in a variety of ways, including through our participation in and coordination of many Circuit Trails projects, as well as the Southeastern Pennsylvania Suburban Bike Lanes Working Group, which includes work to improve the number and connectivity of low-stress bicycle routes in our suburban counties. You can access some of the working data that supports this group's efforts here: www.dvrpc.org/webmaps/bikestress. Delaware County is an active participant in these activities, and also suggested another related project to be conducted under our FY2019 Bicycle and Pedestrian Planning Program (19-52-020) to develop treatments for safer accommodations of bicycles through interchanges and intersections. We have also forwarded your comment and this response to staff at the Delaware County Planning Department, so that they are aware of your interest. More information on Haverford Township trails can be found on the Friends of Haverford Trails website: www.havtrail.com.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
HARRISBURG, PENNSYLVANIA
OFFICE OF SECRETARY OF TRANSPORTATION

January 9, 2018

Mr. Barry J. Seymour, Executive Director
Delaware Valley Regional Planning Commission
190 North Independence Mall West, 8th Floor
Philadelphia, PA 19106-1520

Dear Mr. Seymour:

Thank you for the opportunity to review the Delaware Valley Regional Planning Commission's (DVRPC) draft, Fiscal Year (FY) 2019 Unified Planning Work Program (UPWP). We have completed our review and offer the following comments:

General Comments:

O The Pennsylvania Department of Transportation (PennDOT) is pleased to be working with DVRPC, and our planning partners across the state, to implement the PennDOT Connects initiative. We are encouraged to find this effort reflected throughout the UPWP, and the Department looks forward to our continued and concerted effort to implement this important collaborative planning process for program development and project delivery.

Response: *Thank you for your comment. DVRPC supports the PennDOT Connects initiative and is committed to continuing to work with Central Office and District 6 to ensure its implementation.*

O DVRPC should continue to work with PennDOT and our federal planning partners to integrate Transportation Performance Measures and Performance based Programming into the planning process. DVRPC's proactive work to remain on the forefront of this effort in development of transportation plans and programs is recognized and appreciated.

Response: *Thank you for your comment. DVRPC appreciates the support and guidance provided by PennDOT and our federal partners as we seek to integrate these requirements into our regional planning process.*

O Please coordinate with the Department to identify, program, or adjust current programmed funding required on the current and draft regional Transportation Improvement Program (TIP) for TIP-funded tasks included in the UPWP. In addition to having the funds in place for the tasks, the appropriate charge numbers for invoicing purposes must be established by the

Department Mr. Barry J. Seymour

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for any new task.

Response: *A comprehensive table will be prepared with TIP funded projects for the UPWP and will include the appropriate charge numbers. Appropriate programming will be adjusted for UPWP tasks in the FY2019 Draft TIP for PA.*

Please note that any tasks included in the draft DVRPC FY 2019 UPWP should not show a completion date beyond June 30, 2020. A reasonable time extension can be requested for any continuing/multi-year tasks, or single-year tasks that will continue beyond the June 30, 2020 date. Any requested extensions will be considered on a case-by-case basis. Please provide PennDOT Program Center with a notification of any tasks that will require time extensions by the end of March 2020.

Response: *All new projects for FY 2019 have ending dates of 6/30/19. Any requested extensions for our current FY 2018 projects will be communicated to PennDOT by March 2018 .*

After Board approval, please provide a separate budget (Table "B") with a breakdown of costs [Base Planning (PL), any requested Supplemental PL, supplemental Statewide Planning and Research (SPR), Transportation Improvement Program (TIP)-funded, State Motor License Funds, and Other funds] for contract purposes and to verify Pennsylvania's share of the total Work Program cost. The Department may request additional changes after review of the cost breakdowns provided on Table "B". Requested Supplemental PL/SPR and competitive Federal Transit Administration (FTA) funding is subject to approval by the Department.

Response: *The "Detailed Table B", currently in development, details all project level funding by source and historically is developed as part of the final UPWP package submitted to our funding agencies annually around the March timeframe.*

Section/Task Specific Comments:

Work Program Organization - Page 6

Please Correct "FY 2098" in the first sentence to read "FY 2019".

Response: *Thank you for your comment. This will be corrected in the final version of the UPWP*

Chapter 2-B DVRPC Project Descriptions - Title Page (following page 140)

Please Correct "FISCAL YEAR 2010 PLANNING WORK PROGRAM" to indicate Fiscal Year 2019.

Response: *Thank you for your comment. This will be corrected in the final version of the UPWP.*

Mr. Barry J. Seymour

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DVRPC Project #19-32-030 - Commuter Services/Mobility Alternatives Program (Share-a-Ride) - Page 159

Please note that the MPMS number referenced under the Project Cost and Funding table should be changed from 17900 to MPMS number 110460. The DVRPC Work Program Task and TMA Work Program funding were formerly shared under MPMS number 17900, but will now be separated into their own MPMS numbers. Going forward, this DVRPC Work Program Task will be funded under MPMS number 110460 and the TMA portion will be funded under MPMS number 110429.

Response: *this project will be corrected to indicate the new MPMS #'s for both the DVRPC Tasks (#110460) and the direct TMA tasks (#110429).*

DVRPC Project #19-52-050- Route 422 Operations and Capacity Study Page 215

Please work with the Department to establish the appropriate TIP funded source for this task. Currently, the draft Work Program document indicates that the source is MPMS number 92323, which is incorrect. DVRPC's TIP funded project table, supporting January 2018 Work Program approval, does indicate that funding for this task is to be determined ("TBD"). Please update this information when an MPMS number is identified.

Response: *A new MPMS # needs to be assigned by PennDOT and the document will be corrected with this new number.*

Please contact Mr. James Mosca of my staff at 717.787.1250 or at jmosca@pa.gov if you have any questions regarding the above comments from PennDOT and wish to discuss them in more detail. Thank you for coordinating with the Department during development of the draft 2019 UPWP and for the opportunity to provide comments on the document.

Sincerely,

James D. Ritzman, P.E.

Deputy Secretary for Planning

CC. John Griffies, Contracts Manager, DVRPC

Mr. Barry J. Seymour

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bcc: James Ritzman, P.E., Deputy Secretary for Planning
Gina Burritt, PA Governor's Appointee, Office of the Governor
Nedia Ralston, Southeast Regional Director, Office of the Governor
Larry Shifflet, Director, Center for Program Development and Management
James Arey, Center for Program Development and Management
John Ward, DVRPC
Vanessa Doan, DVRPC
Ken McClain, District 6-0 Executive
Linda Guarini, District 6-0
Jonathan Korus, District 6-0
James Mosca, Center for Program Development and Management
Ellen Sweeney, Ph.D. Center for Program Development and Management
Karen Heath, Office of the Deputy Secretary for Planning

DVRPC Responses to NJ DOT Comments on the Draft DVRPC FY 2019 UPWP

1. NJDOT commends DVRPC on the preparation of an excellent UPWP, NJDOT found the document to be well organized, Written in clear, concise language and accompanied with helpful tables.

Response: *Thank you for your comment.*

2. NJDOT commends DVRPC for incorporating FHWA's planning emphasis areas into the work program, including elements from the FAST Act as well as implementation of MAP 21.

Response: *Thank you for your comment. DVRPC appreciates the assistance and support that we receive from NJDOT and our other partners as we address these Emphasis Areas.*

3. Page 11. The funding summary (Table A) appears to contain information from FY 2018 and should be updated.

Response: *Table A Funding Summary for FY 2018 was mistakenly inserted into the Draft document. The FY 2019 Table A has been prepared and will be included in the final FY 2019 UPWP document.*

4. Page 34. Table B. There is a third section of this table entitled "Task Order Control Amounts" that is normally included. That third section is a critical piece for the NJDOT task order preparation and should be provided.

Response: The "Task Order Control Amounts" Section has historically been included as part of "Detailed Table B" which is prepared as part of the final UPWP package submitted to our funding agencies annually around the March timeframe. The "Detailed Table B", currently in development, details all project level funding by source and historically has not been included in the UPWP document.

5. Page 56. Project 19-33-010 Smart Growth. This project includes the coordination of a Regional Streetlight Procurement Program. The UPWP states that "In FY19, staff will continue to evaluate the first round of the RSLPP as a model for regional procurement and implementation and will assess the feasibility of offering a second round of the program." This language is almost identical to what is in the FY 2018 UPWP. Please clarify.

Response: Thank you for your comment. The RSLPP was the first of its kind in the country to bring multiple municipalities through a financing and implementation process for streetlights along a common timeline. Due to the staffing resources needed to execute the first round of this program, a second round of the program cannot occur until the first round of the RSLPP is mostly complete. As of December 2017, the RSLPP was 85% complete with construction. Evaluation of the program is ongoing in preparation for the potential launch of a second round of the RSLPP or a replication of the program's model for other types of regional implementation projects (e.g. solar for municipal facilities, energy efficiency improvements in municipal

buildings). The first round of evaluation of the RSLPP that will occur in FY 2018 includes surveying participants on their experience with the program, documenting lessons learned amongst program partners, surveying all municipalities in southeastern PA on their level of interest in participation in a second round, discussions with NJ partners on possible replication in the state of New Jersey, and convening a municipal steering committee on cooperative procurement. We anticipate that some of this evaluation will continue into FY 19. Much of the groundwork for launching a round two of the program will take place in late FY 2018, though we also expect this to continue into FY 19 as well.

For greater clarity, we will amend the FY19 work program to replace the sentence you identified with: "In FY19, staff will continue the evaluation of the first round of the program, begun in FY18, that includes surveying current participants, documenting lessons learned, surveying all SE PA municipalities for interest in participation in a second round, discussing interest and feasibility of a NJ program, and convening a municipal steering committee on regional procurement."

6. Page 61. Project 19-33-020 Community and Economic Development. This Section States that "Tasks will include completing the 2018 CEDS review and update, amending the list of vital projects as appropriate, beginning the preparation of the 2019 five-year CEDS update". The DVRPC website states that the CEDS is updated annually, however, this implies that there is a five-year update. Please clarify.

Response: *Thank you for your comment. We will amend the second sentence to better reflect that data and the list of CEDS projects is updated yearly, based on data availability, while every five years a complete update of CEDS goals, objectives, data, and projects must be done. That paragraph will now read:*

"Staff will continue to lead, participate in, and provide support for local and regional efforts to better coordinate economic development and transportation investment strategies in the region, including managing and maintaining the Greater Philadelphia region's Comprehensive Economic Development Strategy (CEDs), as required by the US EDA. As part of the mandate for the CEDS, data in the report must be tracked and updated on a yearly basis (as available). In addition, the entire CEDs report must undergo a complete update every five years where goals and objectives are re-evaluated. FY 2019 is the beginning of a new five-year update. Tasks will include completing the 2018 CEDS review and data update; amending the list of vital projects as appropriate; beginning the preparation of the 2019 five-year CEDs update; and working with regional partners to identify how to best advance the CEDs goal of investing in people and places."

7. Page 91. Project 19-34-040 Regional Congestion Management. NJDOT commends DVRPC for highlighting the implementation of the performance measures.

Response: *Thank you for your comment*

8. Page 103. Project 19-41-010 Technical Assistance to Member Governments. This Section references "working with NJDOT to refine the Problem Statement Pipeline." Three or four years ago the NJDOT worked on improving the problem statement process with the MPOS. This effort has concluded and this phrase could be removed.

Response: *DVRPC will continue to work with NJDOT on improvements to the Problem Statement review, distribution, and development process.*

9. Page 111. Project 19-41-030 Transportation Options. This section of the Work plan states "DVRPC will hold a Regional IMTF Conference in FY 2018 with support from regional IMTF leaders..." It appears that this sentence was left over from the FY 2018 UPWP and should be revised.

Response: *This task will be removed as the IMTF conference will be held in the spring of 2018.*

10. Page 195. Project 19-41.060 TSMO. The language under this task is identical to the language in the FY 2018 UPWP. It makes reference to activities that will take place in FY 2018 rather than FY 2019 and shows the same budget of \$933,500. Please correct or clarify.

Response: *Many of the FY2019 tasks for this program area are on-going and remain largely the same as in the FY2018 UPWP. Edits will be made to correct the funding year to FY2019 UPWP and to clarify tasks. The budget for the program area remains the same.*

11. Page 233. Project 19-52-120 Regional Sidewalk Inventory - NJ Counties. This is an effort that was programmed for Pennsylvania in FY 2018. The description states that "If FY2018 performance is Satisfactory, the qualified consultant creating the inventory for the five PA counties will be retained to develop the NJ sidewalk inventory." Before the consultant selection is finalized, we request more discussion.

Response: *Thank you for your comment. This is a single regional project for which we are in the process of selecting a vendor competitively -- even though the work will be phased and funded from multiple sources, like many of our projects and program areas. Our RFP referenced the regional scope of this effort in its title, as well as in its tasks and deliverables, and our selection committee included a representative of our New Jersey member governments as well as our Pennsylvania member governments. Our intention is to avoid duplicating a procurement process for regional work, and we believe we have honored all requirements for competitive vendor selection.*

12. Page 241. Project 19-59-700 Member Government Special Projects. This Work item has a budget of \$1,065,403 and appears to be a place holder for special project requests that may arise during the year. If possible, include an explanation of how the projects are selected.

Response: *This project is a placeholder for project requests that come in to DVRPC throughout the fiscal year from member governments or operating agencies after the UPWP has been approved by the DVRPC Board. In the past, these projects have included work such as a request by PennDOT for traffic forecasts on a specific facility, a grant from a federal agency that supports a federal program, or a grant from a non-profit organization to provide technical services or guidance. These projects are not generated from a competitive program in which DVRPC selects projects. Each project request that comes in, includes a specific funding source which is additional funding to DVRPC and is presented to the RTC and Board for approval as a Work Program*

amendment.

13. Page 361. Project 19-66-000 TCDI. Under the section on Goals for this project, the overall emphasis on transportation should be emphasized.

Response: *Thank you for the comment. We will update the Goals section to read:*

“Implement Connections 2045 Plan for Greater Philadelphia by supporting early stage local government planning initiatives that advance the plan’s five principles: Sustain the Environment, Develop Livable Communities, Expand the Economy, Advance Equity and Foster Diversity, and Create an Integrated, Multimodal Transportation Network. All projects must also enhance the region’s multi-modal transportation infrastructure.”

14. Appendix A. In the past, DVRPC has provided a “Table H” showing continuing tasks from previous years. This is needed so the tasks can be properly reported to the federal agencies.

Response: Historically, Appendix A has not been developed as part of the Draft UPWP document. Information regarding its contents, PennDOT/NJDOT Continuing Task Orders, is typically not fully known at this point in the fiscal year. Appropriate tables will be developed for inclusion in the Final UPWP document as that information becomes more available.

Miscellaneous Typos, Formatting and Grammatical Corrections

1. General Comment. Throughout the document inconsistencies with acronyms were observed, Specifically when and where they are introduced. For example, Some acronyms are never identified (except in the Appendix) and some acronyms are identified three times in one paragraph. (See TIP on the bottom of page 22.) A standard format could improve the appearance of the document.

Response: *Thank you for your comment. We will go back through the document to address any inconsistencies with acronyms.*

2. General Comment. Throughout the document, fiscal years are shown in many different styles. They appear as “FY 2019 or “FY19” or “FY 19. A standard format could improve the appearance of the document.

Response: *Thank you for your comment. We will go back through the document and insert FY 2019 as the standard format.*

3. General Comment. There are inconsistencies with the treatment of NJDOT. In some cases it is written with a space as “NJ DOT”.

Response: *Thank you for your comment. The treatment of NJDOT will be corrected in the final version of the UPWP.*

4. General Comment. Throughout the document there are several places where a different

format is used for numbering under Tasks. A uniform numbering format could be used to improve the appearance of the document. (See pages 74,78, 88, 100, 119, 225.)

Response: *Thank you for your comment. A uniform numbering format will be considered and included in the final version of the UPWP where appropriate.*

5. Page 6. Introduction. In this section, "FY 2098 should be changed to "FY 2019.

Response: *Thank you for your comment. This will be corrected in the final version of the UPWP.*

6. Page 141. The title states "Fiscal Year 2010 which should be "Fiscal Year 2019.

Response: *Thank you for your comment. This will be corrected in the final version of the UPWP.*

7. Page 143. The section begins with the sentence "DVRPC staff will Work convene a Data/GIS/Modeling Group." This should be revised to read "DVRPC staff will work to convene a Data/GIS/Modeling Group... "

Response: *Thank you for your comment. We will remove the word "Work" from the first sentence so it will now read "DVRPC staff will convene a Data/GIS/Modeling Group to prioritize data needs..."*



January 5, 2017

Re: FY2019 DVRPC Work Program

Dear Mr. John Griffies:

As members of the New Jersey Circuit Coalition's steering committee, we are submitting the following comments on the FY2019 DVRPC Work Program. The New Jersey Circuit steering committee members that have contributing to this document include John Boyle (Bicycle Coalition of Greater Philadelphia), Dana Dobson (Tri-State Transportation Campaign) and Olivia Glenn (New Jersey Conservation Foundation). Below our are joint comments.

Camden Bicycle and Pedestrian Plan

While we understand that there are many projects that were submitted to the work program, we request that you will reconsider the City of Camden's request to create a priority bicycle and pedestrian network for Camden.

This work program request originated when the City of Camden asked bicycle and pedestrian advocates to work together to develop a prioritization network for the Camden GreenWay in early 2016. This was intended to continue the work of the Camden Circuit Trails Plan developed by NV5 (formerly RBA) that was released in 2016. Through our work, we analyzed existing transportation and land use plans, and other considerations such as New Jersey Economic Development Authority (EDA) projects, This work was supported by and presented to Brandywine Realty Trust. It was also presented to City of Camden officials. Our project found four priority corridors and provided cross sections, basic route alignments, and further follow-up for the continuation of this plan.

The need for this bike/pedestrian prioritization plan critical due to the influx of new development occurring in Camden City and the need for a strategy to implement multi-modal transportation throughout the City, but especially along the EDA projects such as Knights Crossing and Liberty Property Trust. If this plan is not passed in a timely fashion, poor bicycle and pedestrian planning could be in the ground before there is any time for safe, effective multi-modal recommendations and best practices to be implemented.

The City of Camden informed us in summer 2017 they would endorse the Plan's adoption by Camden City Council if it was brought to them as a final product. As advocacy groups, we are not in a position to formalize this plan or hire a consultant for the work. The City of Camden submitted this project to DVRPC, after it had been reviewed by the Office of Transit, Bicycle, and Pedestrian Planning. We hope that this work can be further refined and developed through DVRPC so that the City of Camden can adopt it as part of an ordinance and guide future road infrastructure work that promotes the highest quality bicycle and pedestrian facilities possible.

If DVRPC needs any more information or materials from our work in order for this project to be re-considered, please reach out to us directly.

Response: *Thank you for your comment, and for this additional background. This project was not included in the draft work program because of limited staff capacity. We received more proposed work than we can take on under the Bicycle and Pedestrian Planning Program and related program areas given other commitments, and continuation of the Healthy Community Master Plan work is also a high priority for Camden. This is a good project and we appreciate your support for it. We are still working with the city on other ways to potentially conduct this work.*

Vision Zero and Complete Streets Language Through the Work Program: (Addressed in 19-33-010 Smart Growth (p.55), Environmental Planning 19-33-040 (p.71) and 19-52-020 Bicycle and Pedestrian Planning Program (p.131) as well as other specific projects)

Throughout the document, Complete Streets and Vision Zero (in Philadelphia City projects) are mentioned. Could Vision Zero also be incorporated into the Complete Streets work program language since Vision Zero also has many of the benefits of Complete Streets such as equity and safety?

The document has many references to Complete Streets but the only reference to Vision Zero is through the project *PennDOT Connects Evaluation of Philadelphia Paving Plan for Bicycle Improvement Feasibility 19-52-060* in the Office of Transportation Safety 19-34-030. Conversely, Complete Streets, other than mentioning the Trenton Complete Streets project, is absent from safety. Could Complete Streets and Vision Zero be discussed more coherently together?

We believe that DVRPC can be a leader to bring the concept of Complete Streets and the introduction of Vision Zero to the forefront of the region's transportation planning. We would like to see more emphasis on Vision Zero and Complete Streets on any project, products or messaging that has a goal of improving safety.

In the Long Range Plan comments provided to us from DVRPC, it states that the Regional Safety Task Force has already endorsed the concept of reducing traffic deaths and we thank you for acknowledging this as a priority. However, DVRPC should clarify their position on "Vision Zero" versus "Towards Zero Deaths": Similar yet two very different goals.

Response: *Thank you for your comment. DVRPC is committed to supporting efforts by our local and regional partners to pursue safety improvements--sometimes under a Vision Zero policy umbrella, and sometimes under other terms but with similar aims. We will add references to supporting Vision Zero efforts to some of the program area text that you mention.*

19-33-040 Environmental Planning 19-33-040 (p.71)

The Circuit Coalition supports the work of the Environmental Planning program at DVRPC. The planning staff has been very helpful in providing data and resources to the Circuit Coalition.

Response: *Thank you for your comment. DVRPC remains committed in our support of efforts to implement the Circuit by providing technical assistance on funding, trail planning, evaluation metrics, and trail construction.*

15-44-320 William Penn-Planning, Design and Construction of Priority Trails (p.353)

The Circuit Coalition supports this program. This program authorized in 2014 has brought many Circuit Trails to advance such as the parts of the Chester Valley Trail in Pennsylvania and the construction to the Trenton Wellness Loop. We are glad that this work can continue through funding in the 18-33-200 work program item.

Response: *Thank you for your comment. DVRPC remains committed in our support to help complete the Circuit.*

18-33-200 William Penn - Completing the Circuit (p.355)

The Circuit Coalition supports this program. This \$6.6 million from 2018-2021 will allow the Circuit Coalition to continue its work through the region. We would also like to thank DVRPC and the member governments for making this a continued commitment in the 2045 Connections Long Range Plan and the William Penn Foundation for its continued support of multi-use regional trails.

Response: *Thank you for your comment. DVRPC remains committed in our support to help complete the Circuit .*

19-52-110 Regional Strategy and Best Practices for Bike Share Program Coordination (p.229)

We support this program and look forward to the results of a regional bike share analysis. Tri-State Transportation Campaign and the Bicycle Coalition of Greater Philadelphia would like to participate in the public process and provide feedback for this project.

Response: *DVRPC is glad to hear of the interest in this project and will include both organizations in our outreach to stakeholders.*

19-33-120 and 19-33-080 Campbells Soup - Camden City Food Economy (p.179) and Healthy Communities Planning (p.167)

Although there is an emphasis on transit and access in the work program description, we have seen little outreach to active living or open space stakeholder partners in both creating the Camden Health Element and the Get Healthy Camden Collaborative working group. Last year we requested that this work program item reach out to various active living partners, but it did not seem to do so effectively. However, we hope that Get Healthy Camden will prioritize engaging active living partners, such as the Circuit Coalition members, to add to its numerous healthy eating partners.

While we understand that this work comes originally from a food access and healthy eating perspective, we hope that a comprehensive health plan can integrate active transportation through specific bicycle and pedestrian recommendations that could improve health in its residents. The Circuit Trails would like to see more involvement, as well as recommendations for the implementation of the Camden GreenWay bike

network.

Food security, access to open space, and mobility through several modes of transportation, including sidewalks, are environmental justice issues. It is hoped that as these work products are developed for this work project, larger connections are made and the findings are shared within DVRPC and with city and county planners to influence planning and zoning decisions. Perhaps as the EJ tools are evaluated (19-23-040), food security, access to open space, and information on the sidewalk network can be optional layers to add to the Environmental Justice web mapping tool with Camden City as a pilot.

Response: *Thank you for your comments. Both the Camden Health Element and the Campbell Soup - Camden City Food Economy projects are ongoing projects that engage a variety of stakeholders, including active living and open space stakeholders. DVRPC plans to convene the first Camden Health Element Advisory Committee meeting in late February/early March and will invite a variety of organizations to participate. We would welcome any suggestions for organizations that you think should be involved. Additionally, DVRPC is currently convening a small steering committee for the Campbell Soup - Camden City Food Economy project, which is comprised of a variety of organizations including Camden County Planning Department and Cross County Connection TMA. The steering committee is helping us plan an all-day workshop on transportation access to healthy destinations, to be held in the late spring/early summer. We plan to invite a variety of organizations to participate, including active living and open space partners. We will also evaluate adding the elements you suggested to our EJ tools.*

19-52-120 Regional Sidewalk Inventory - NJ Counties (p.233)

The Circuit Coalition supports this program. This will be a useful tool for New Jersey on future projects and we look forward to its completion.

Response: *Thank you for your comment. This project will create a resource to help communities in the region become more pedestrian friendly and accessible.*

19-63-028 Safe Routes to Transit Program: New Jersey (p.345)

The Circuit Coalition strongly supports this program. We look forward in particular to the Florence RiverLINE station study that will be able to potentially connect to the East Coast Greenway and Circuit Trails network. However, the name generates confusion with the NJDOT Local Aid program with the same name.

Response: *Thank you for your comment. DVRPC appreciates the support for the program and will consider if and how it makes sense to differentiate the name of the program without losing the preciseness of what the program encompasses.*

19-52-020 Bicycle and Pedestrian Planning Program (p.131)

Thank you for extending work on the LTS and Connectivity analysis. This is an excellent project and we are pleased that DVRPC will continue to extend the analysis beyond the PA suburban counties into the four NJ counties and Philadelphia

We request that this program will be able to incorporate our ask for the Camden City Bike and Pedestrian implementation plan in the future year's projects. This document would be benefit to the multi-modal planning of the Camden city, similar to how the DVRPC Trenton Downtown Bicycle and Pedestrian plan aided Trenton's respective planning efforts.

Response: *Thank you for your comments, and for your ongoing collaboration on the LTS and Connectivity Analysis project. As noted above, the Camden City project was not included in the draft work program because we received more proposed work than we can take on under this program area given other commitments, and continuation of the Healthy Community Master Plan work is also a high priority for Camden. This is a good project and we appreciate your support for it. We are still working with the city on other ways to potentially conduct this work.*

19-52-070 Southeastern Pennsylvania Pedestrian Counting Program (p.221)

We appreciate that DVRPC is working on the pedestrian counting program. This program gives valuable data for non-automobile modes and is used by Circuit Coalition partners. Is there any possibility that this could be expanded to New Jersey in the coming years?

Response: *Thank you for your comment. The resources to fund this project are proposed to come from a PennDOT Program and therefore will be constrained to count locations in DVRPC's five Pennsylvania counties. There was no funding source available at this time from New Jersey. DVRPC will explore potential resources in the future that will allow us to conduct these types of counts in our four New Jersey Counties.*

18-41-070 I-95 Planning Assistance (p.145)

We support this program and participate when we are invited to do so.

Response: *Thank you for your comment. We appreciate your participation.*

19-52-060 PennDOT Connects Evaluation of Philadelphia Paving Plan for Bicycle Improvement Feasibility (p.220)

The Circuit Coalition Supports this project. We hope that this can be expanded into the Counties as part of the evaluation of bicycle routing connectivity. This is a best practice that should be pitched to NJDOT and the County road road departments.

Response: *Thank you for your comment. This project is intended to develop a project pipeline in the City which mirrors the pipeline being developed for the suburban counties in PennDOT District 6-0 in collaboration with the Southeastern PA Suburban Bike Lanes Working Group. We will continue to work with our New Jersey partners wherever possible to develop and pursue similar efforts to make project development pipelines more responsive to local planning priorities.*

19-23-040 Title VI and Environmental Justice (p.46)

Thank you for the work that you have done in our region in promoting Environmental Justice and in creating a digitized mapping platform that provides a user-friendly format to digest communities with indicators of potential disadvantage. Any improvements to your online modeling should build upon your current mapping success.

In terms of additional stakeholders, please proactively engage with the Offices of Environmental Justice at PA DEP and NJDEP, as well as their respective advisory boards: Environmental Justice Advisory Board in Pennsylvania and the Environmental Justice Advisory Council in New Jersey. Finally, please work with Environmental Justice points of contact at USEPA's Regions 2 and 3 offices to ensure efforts are concerted between our MPO, state entities, and federal EJ counterparts.

For training, additional tools, and prospective updates to Indicators of Potential Disadvantage, please employ and thoroughly peruse EJSCREEN. Please also share EJSCREEN and its contents (or at least determined relevant links) with the citizens and stakeholders of the DVRPC region.

As you are updating documents, please assess the membership of the Public Participation Task Force and any other work groups to ensure that membership and received input reflects the many communities and tribal governments that DVRPC represents. After your assessment, proffer recommendations to enhance this diversity as needed. In addition to racial diversity, this should also include, but not be limited to,

those who have expertise and/or experience in working with limited English proficient populations, car-less populations, and non-institutionalized disabled populations.

Please also give consideration to exploring, providing, and identifying opportunities to more effectively engage the public so that fair treatment and meaningful involvement flourishes in our region. We do appreciate the ways you have sought to foster more public engagement, such as through providing conference call in lines for some of your public meetings. Continue to innovate to ensure all voices are able to be a part of their region's planning process.

Amongst stakeholders, please also consider reaching out to Sustainable Jersey, as they are working on an Equity framework. Sustainable Jersey would also be a great additional lens to share their experience working with local governments and regional hubs in New Jersey.

Response: *Thank you for your thoughtful comments. DVRPC is committed to protecting residents' Civil Rights and better understanding the benefits and burdens placed on specific neighborhoods and populations of special interest - the building blocks of Environmental Justice. DVRPC staff are regularly reviewing and updating webmaps, reviewing data displays, and revising the language we use to explain population characteristics. We have reviewed EPA's EJSCREEN in the recent past as we plan to release an updated webmap in this current fiscal year (FY2018).*

Thank you for recommending additional stakeholders with which DVRPC could engage. We will keep these recommendations in mind when we are planning a relevant meeting for their participation - such as an upcoming Public Participation Task Force meeting that will focus on the tools and/or analysis DVRPC uses to identify issues related to Environmental Justice and Title VI of the Civil Rights Act.

Thank you for your comments regarding PPTF membership and engagement techniques. Each year, DVRPC's Office of Communications & Engagement reviews the agency's public outreach efforts, which also includes PPTF membership. This current fiscal year (FY2018) is the first year staff are reviewing PPTF membership through the lens of selected demographic and socioeconomic characteristics, some of which you have suggested. As you mentioned in your letter, staff throughout the agency are constantly exploring different ways to engage with diverse audiences throughout the region.

Thank you for your suggestion to work with Sustainable Jersey. Different staff members throughout the Commission have been integral parts of several work groups. We will further investigate the equity framework.

19-33-100 A Resilient Greater Philadelphia (p.175)

Thank you. We are hopeful that within this work program, there is also a focus on mitigation so that the approach isn't simply to respond to the very real threats of climate change, but also mitigate our region's contributions to exacerbating climate change. Within the Work Program document, there are several initiatives that are assessing climate change mitigation. We are simply highlighting that resilience and mitigation efforts should be addressed concertedly.

Response: *Thank you for your comment, and interest in greenhouse gas mitigation. DVRPC addresses greenhouse gas mitigation across multiple projects and elements of our work program. We have a sustained focus on decreasing emissions from the transportation sector by promoting public transit, bicycling and walking, developing more compact land use patterns, and increasing energy efficiency across multiple sectors. The project you reference intentionally focuses on addressing and planning for the expected impacts of changing climate. This project does not mean we will be shifting any of our emphasis away from climate change mitigation, which is necessary for a sustainable future. If you would like more information on our climate change mitigation activities, please contact us.*

Thank you.

John Boyle
Bicycle Coalition of Greater Philadelphia

Dana Dobson
Tri-State Transportation Campaign

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