



REGIONAL TRANSPORTATION PLAN 2050

MOVING SOUTH JERSEY FORWARD

APPENDIX H QUESTIONS, COMMENTS, AND REPNSES FROM RTP 2050

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Photo: Outreach Event,
Ocean City, New Jersey



QUESTIONS, COMMENTS, AND RESPONSES FROM RTP 2050

Public Comments

The following are the comments we received to date for the RTP 2050. These include comments from the virtual public meetings as well as the RTP email.

Wednesday, August 19, 2020 (10:00-11:00 AM) – Virtual Public Meeting #1

1. **Question:** Is the Pinelands regulation lack of flexibility due to dated regulations and need for updating?

Response: Based on the input we received from our subregions as well as our own experience, the Pinelands regulations seem to be less an issue of updating the regulations, and more an issue of flexibility. The flexibility seems to be what often holds up projects. Further, there seems to be little or no recognition for the scale of impact of countermeasures. For example, if you needed to minimally widen a roadway in the Pinelands, not for additional travel lanes, but simply to include a safer three-foot shoulder, consistent with modern safety standards, that would trigger certain requirements from a drainage mitigation standpoint, which significantly hinder the ability of roadway owners to advance these projects, due to the added time, additional engineering, or cost. It can get complicated quickly to construct a simple as a shoulder widening to meet today's standards.

2. **Question:** Are there plans to extend public transit access in the area, like the proposed Glassboro-Camden line? (staged question)

Response: As far as the Glassboro-Camden line, it is mentioned in our Plan. As of now, the Delaware River Port Authority is investigating the feasibility of a light-rail line between Camden and Glassboro. Glassboro is not in our region, but I think it can be said that it will probably impact our region and induce people from our region to use the line. At the current time, NJ TRANSIT providing technical assistance to advance the environmental review for this proposed 18-mile light-rail line. This review is necessary for the approximately \$1.6 billion to become potentially eligible for Federal capital funds. However, designation of a project sponsor and identification of funding sources remain outstanding issues. SJTPO will continue to monitor the project, as a Glassboro-Vineland link may be more feasible once the Camden-Glassboro line is implemented. As far as other expansion or access to other transit lines, we will continue to work with New Jersey Transit to ensure that we can improve access, meet existing access needs, and even improve access to the bus lines and Atlantic City Rail Line.

3. **Question:** How has the impact of COVID-19 affected transportation planning? (staged question)

Response: Broadly speaking, COVID-19 is still going on, we are in the middle of this, so exactly how this is all going to play out in the end, is going to determine a lot about how much we need to change what we are doing. In terms of the draft RTP we have out, it does not really reflect COVID-19 because we were working on the RTP before COVID-19 and finished the RTP when COVID-19 was in its early stages. We do intent to do an update prior to the final adoption so we can highlight some changes that have taken place throughout the document.

In terms of transportation planning, from what I have seen, the projects are still moving forward. The money has not stopped coming in for projects, and hopefully that does not change. Projects are not being delayed other than where public outreach is concerned. I have a project, that for every other reason continued moving on, but was

delayed for a few months because we were trying to figure out how to do public outreach in a way where people could actually participate, and we were not leaving people out, who did not have access to internet.

4. **Question:** How are emergency projects and costs handled, such as a bridge collapse?

Response: There are a lot of variables. If it is a local bridge, state bridge or something owned and maintained by one of the authorities like the Parkway or the Expressway, there are emergency mechanisms for funding, either through their own capital programming or I-Bank, depending on the severity. The State would have to come up with the additional funding. Most of the federal funding that's programmed in the SJTPO region is done early on and all the money is typically accounted for. For an emergency project, like that, it would have to be some sort of other funding type.

Increased Security, Goal 10, one of the strategies is working with our subregions to apply for emergency grants administered through the Federal Emergency Management Agency (FEMA). Applications are data intensive and require a lot of requirements, so we could be a good resource for the counties and subregions that apply for grants. We are not an implementing agency and we do not own any infrastructure assets; we have a secondary role to these emergencies. We focus on the long-term planning. Along with that goal of Increased Security, we want to be in communication with the counties – what their needs are and how to meet these needs. Sometimes there is a disconnect between what the planning side of the equation and the operation side. One of our goals is to try and strengthen that linkage.

Monday, August 31, 2020 (2:00-3:00 PM) – Virtual Public Meeting #2

1. **Question:** How has or will COVID-19 impact transportation planning? (staged question)

Response: To some extent, it is kind of hard to tell because we are still really deep into COVID-19. We do not really have an idea yet of exactly how long this is going to go on. So far, things are pretty positive. The funding we were expecting to come in before still looks like it is coming in. Hopefully, that will not change. Looking in our RTP, we are talking now about ways to try to incorporate some changes we are expecting. Obviously, the RTP started before any of this happened, so the document you see does not really reflect COVID-19. Before we adopt the RTP, we are hoping to throw in some highlights and some updates and stuff throughout the document. The projects I have been seeing are still moving forward. No major delays, surprisingly. Any delays I have seen have been related to conducting outreach, which has been difficult. We have been trying to figure out how to handle things. Usually, we like to have in-person public information centers for a project. Trying to do a virtual only option, especially for some of the communities there in not phenomenal internet access. And then in the projects, there have been some State furloughs during COVID-19, but DOT has really stepped up, and I have not seen any delays. In a nutshell, it is positive in terms of things still seem to be moving forward.

2. **Question:** What are your next steps? Plan adoption?

Response: Before we adopt the Plan, we are going to do a second round of public outreach. We assume COVID-19 will still be impacting our efforts, so for the next round, we would like to reach new groups of non-traditional partners, such as those that work with the disadvantaged populations in the region. To do this, we are thinking we need to go a more traditional, simple route – maybe some flyers, comment cards, and palm cards – rather than internet-based activities. These are preliminary ideas, so they are not fully fleshed out. We would like to note that we will make everyone aware of our plans via the website, e-list, social media, and the local papers. Once outreach is complete, all the questions and comments we receive will be answered and included as an appendix in the RTP. After including the public comments, the RTP will go to TAC in January of 2021, followed by Policy Board approval that same month.



3. **Question: Will the new project prioritization change the types of projects that are funding in the SJTPO region? (staged question)**

Response: This will be the first time using the updated process. I do not think it is going to impact the types of projects. The goal is for it to enhance the type of projects that are already priorities to the subregions. One example is Atlantic City. The city was looking to do a resurfacing project along Atlantic Avenue. When we investigated the project a bit more, we realized that corridor is one of the most dangerous corridors for pedestrians and bicyclists in the region. Working with Atlantic City and our other partners, we did a safety audit, and the results were a more advanced design, with a road diet, bicycle lanes, and accommodations for transit to make the project a better fit for the location.

4. **Question: Are there plans to extend public transit access in the area, like the proposed Glassboro-Camden line? (staged question)**

Response: The Glassboro-Camden light rail line project has been around for the last twenty years or so. The Plan does mention the line. The project is in the middle of an environmental study, which NJ TRANSIT is supporting the Delaware River and Port Authority. However, it is an expensive project, at about \$1.6 billion. One of the big challenges is the lack of identifying the funding source. As far as transit expansion, this line is the most key project. To my knowledge, most of the other transit projects in the plan are maintenance or operating expenses. I do not think there is anything specific as far as transit-system expansion. One more thing, there is a proposed station in Pomona (Egg Harbor city), that is in discussion. Atlantic County has long been pushing for this station. It is not a committed or definite project.

5. **Question: Are some projects not funded after the evaluation process? (staged question)**

Response: This kind of comes back to the requirement that both the RTP and Transportation Improvement Program (TIP) must be fiscally constrained. Funding has to be programmed for each project and within the amount that has been allocated. When we begin to intake projects from the subregions and look at the preliminary costs, our funding program depends on how many projects come in and their cost estimates. If at the end, there are more projects than money, we have to make that call, and that is what the scoring process is for, so that TAC, SJTPO staff, and the Policy Board can make the decision to say which projects are moving forward and which ones will have to wait until additionally funding is identified. Obviously, we want all projects to be funded, but SJTPO only has discretion over about \$11 million, and typically there are more projects than \$11 million can fund, so some projects cannot advance.

6. **Question: Has a study been done to determine what impact to traffic flow would occur should mass transit systems be impacted?**

Response: I am not clear if the question is referring to a specific change, like what impact there would be to traffic from the Glassboro-Camden line. Generally, that would fall outside of our region if it only goes to Glassboro. That would be DVRPC's region, as Glassboro is in Gloucester County.

7. **Question: Do you foresee more opportunities for Transit Oriented Development (TOD)?**

Response: –Being in New Jersey, a home rule state, the Metropolitan Planning Organization (MPO) do not have any direct land use controls. It is a very local thing as a home rule state. Obviously, a TOD type of transit project would rank very high on a project prioritization evaluation, so it would be something that we would likely fund, rather than not fund. SJTPO funds local led projects, we do not take the lead on any construction projects. A train station at Pomona would be an example, or even something at the airport. If a new roadway needed to be

constructed and the county was doing some of the development and the county was seeking federal funding through traditional funding sources, then that would be something to work hard to help fund. As far as TOD designation in say Hammonton, that would be something the municipality would have to undertake, and then we would support any way we could.

Thursday, September 10, 2020 (6:00-7:00 PM) – Virtual Public Meeting #3

1. **Question:** How has the pandemic impacted your work on the RTP? (staged question)

Response: Due to COVID-19, we have had to switch gears a bit. Specifically, with this round of public outreach, we intended to host in-person meetings. We had plans to go to the Community Food Bank, located in Egg Harbor Township. We also had plans to go to Family Success Centers throughout the region. These plans did not happen, and that is okay. We are now hosting virtual public meetings, which have been working out well. We have noticed more people attending the virtual public meetings compared to in-person meetings. The only other point to mention is that we will be editing the RTP to include updated content as it relates to COVID-19.

2. **Question:** Will the new project prioritization change the type of projects that are funded in the SJTPO region? Will there be project not funded? (staged question)

Response: The project evaluation process is intended to enhance projects, not so much to shape the type of projects. All of our subregional partners, counties, and some of the municipalities, are still going to put forth the projects they feel are the highest priority and indicated as a need, such as fixing a bridge or repaving a road. The evaluation process is really going to look at our goals holistically for the region, looking for ways of making it better. As far as the funding goes, SJTPO has approximately \$11.0 million available for projects each year, so not every project that gets proposed is able to be funded. There is a finite amount of money and there is always more project than what can be funded.

3. **Question:** Are there plans to extend public transit access in the area, such as the Glassboro-Camden line? (staged question)

Response: The Glassboro-Camden line is mentioned in the RTP. A feasibility study is being done by the Delaware River Port Authority. NJ TRANSIT is providing some technical assistance. However, there currently is no money to build the line. We are looking at the project with interest. If the Glassboro-Camden line goes through, hopefully, we could get a Vineland connection, which is in our region.

4. **Question:** Can you inform us about the next phase of outreach? (staged question)

Response: Our aim is to reach new, non-traditional partners, such as college students and individuals from the disadvantaged populations in the region. We would like to go a more traditional route and not focus too heavily on internet-based activities. Outreach materials can include flyers, comment cards, and palm cards. There is still much to figure out, with locations throughout the region still closed and restrictions on gatherings and contact. Regardless, whatever outreach methods we select, we will inform the public through the website, e-list, social media, and local newspapers.

5. **Question:** You mention over \$1.0 billion in unfunded critical needs. What are those needs? Isn't everything critical? (staged question)

Response: Yes, everything is critical. A lot of it is subjective. In a nutshell, over \$1.9 billion is committed funding. There is a remaining \$3.0 billion that is not programmed into specific projects. There is no itemized list of projects for \$3.0 billion. Most of the money will go to system preservation. We do have a list of unfunded



critical needs, as identified by each of our subregions. They total over \$1.0 billion and are listed in the RTP. The critical needs consist of bridge rehab projects, roadway resurfacing projects, and among others. These projects should be first in line should additional funds become available.

6. Question: How does SJTPO prioritize shared-use path project funding?

Response: Depending on the specifics of the project, it could potentially be funded under the Transportation Alternatives Program (TAP), Safe Routes to School, or New Jersey Bikeways Grant. It depends on if the project is a State solicitation, or a project is adding additional facilities, such as a bike lane or sidewalk. If so, it would score higher on project evaluation because of how the points are given to those priorities.

7. Question: Does SJTPO have a position on mileage-based fees as a potential replacement for declining motor vehicle fuel tax revenue?

Response: In our RTP, we do not mention any potential funding alternatives, so we do not have a position. We, as individuals, are participating in a user-based fee pilot program. It used to be the I-95 Corridor but has a new name, the Eastern Transportation Coalition. We are participating and staying involved in the program.

Additional Comments Received

1. Question: I looked through RTP 2050 and I did not see any recommendations for funding for the reconstruction of the Atlantic City and Wildwood Boardwalks. I may have missed it, but could SJTPO take a strong stand on the need to secure state and federal transportation funds to rebuild these Boardwalks? Both projects are top priorities for their communities and counties and as noted in the Plan are a wonderful part of our bike and pedestrian infrastructure. The Boardwalks are defined as public streets – however, their primary use is for bike and pedestrian travel – something that we are seeing more of as a result of COVID-19.

Response: While the reconstruction of the Atlantic City and Wildwood Boardwalks may not be mentioned “specifically” in RTP 2050, there are numerous references of boardwalks throughout RTP 2050 as an existing and potential future pedestrian and bicycle amenity. SJTPO has recently embarked upon the South Jersey Trails initiative, a major effort in which SJTPO hopes to build a regional trail network similar to The Circuit in the DVRPC region. Part of this trail network could include boardwalks in Atlantic and Cape May County. The South Jersey Trails network is discussed in Chapter III. SJTPO will work with the City of Atlantic City, Atlantic County, the City of Wildwood, Cape May County, as well as other stakeholders as appropriate to secure more funding for these and other Boardwalks throughout the Region.

2. Question: Good Morning – Thank You for the opportunity to participate in the SJTPO’s 2050 Regional Transportation Plan webinar. Will the attendee list be available since we were not able to attend in-person?

Response: SJTPO will not make available the virtual public meeting attendee list since attendees never disclosed if they were comfortable with SJTPO sharing their information."

3. Question: Completion of Route 55: This is a safety issue. With the threat of storms increasing as our climate warms, Cape May County needs another evacuation route.

Response: Thank you for your comment. “Prioritize evacuation projects” is a major strategy identified in RTP 2050. We will continue to work with Cape May County and our other planning partners to explore additional evacuation routes within Cape May County and throughout the region as a whole.

4. **Question:** Rails to Trails: The recently opened Beesley's Point Parkway Bridge Bike path is wonderful except a bicyclist cannot safely get to the bike path that begins at the County Park and goes south to Cape May. This is because of wetlands in Upper Township known as the Great Cedar Swamp. The only transportation infrastructure that crosses the wetlands are abandoned railway beds. Seashore Rail Lines has a long-term lease with the NJDOT. Their trains have not run in over 10 years. The railway beds are overgrown and in disrepair. If those railway beds are converted to bike paths, a safe route for bicyclists would then exist for bicyclists to ride the length of Cape May County safely. Can't something be done?

Response: Thank you for your comment. SJTPO has identified this as a top priority in advancing the South Jersey Trails network. SJTPO has included a technical study in the draft FY 2022 Unified Planning Work Program (UPWP) to conduct a Trails Feasibility Survey to identify an appropriate corridor to connect the Parkway Bridge with Cape May County's trail network in Woodbine, Dennis Township, and points south. It is too soon to say precisely which rights-of-way may be selected as most feasible for trail advancement, but we will include this comment in that effort and ensure that the corridors mentioned are evaluated. Further, SJTPO plans to constitute a South Jersey Trails Advisory Committee in 2021, which will, among other things, establish a visionary network for South Jersey Trails and identify priority trails and corridors to advance that network.

5. **Question:** I work as a consultant to Ocean City and will be providing the city with comments re: the RTP. Are there any specific areas in the report that you see as of particular concern/interest to Ocean City?

Response: Being a coastal city, the section on "Climate Change and Greenhouse Gas Emissions," which includes a discussion of sea level rise, would likely be of particular interest. Further, the chapter on Resiliency, "Goal 5: Improve the Resiliency and Reliability of the Transportation Infrastructure" is particularly germane to Ocean City. Chapter III: Existing Conditions and Trends, includes an extensive discussion on major off-road trail facilities, including the Ocean City Bike Path and the Route 52 Bridge Trail. The attraction of the Jersey Shore and the huge influx of traffic it brings every summer is another major theme that permeates throughout RTP 2050.

6. **Question:** [Cape May] County has developed a Comprehensive Bridge Replacement and Improvement Plan to tackle the many challenges over the next 15 years that we will face with bridge rehabilitation and replacement. In the past, I had forwarded you at least portions of the identified work noted in the plan for incorporation into it the RTP and Critical Needs Assessment. Enclosed is a copy of our bridge plan which we would like incorporated in its entirety into your current RTP.

Response: All of the projects listed in Tables A and B from *Cape May County's Comprehensive Bridge Replacement and Improvement Plan* are included in RTP 2050. Most of them are included in Table 31: *Cape May County Unfunded Critical Needs*, located in Chapter V. A few are also included under: "Other Funded Projects of Regional Importance," also in Chapter V.

Federal Highway Administration (FHWA) New Jersey Division Comments

The following are comments received by SJTPO from the New Jersey Division of the Federal Highway Administration (FHWA) and responses thereto. Please note the page numbers may have changed between the original draft and any subsequent revisions, and so the page numbers may not directly correspond to the initial comments made by FHWA.

Regulatory Comments:

1. **Comment:** The Plan meets the Federal requirements – includes all the required elements.



Response: Thank you.

Recommendations for Future Consideration:

1. **Comment:** For each of the goals (as applicable), the strategies are lacking action to address safety. The strategies should define how safety planning efforts will lead to a recommended project construction and facility operating strategies, or relate to strategies for enforcement, education, and emergency service provision. When appropriate, safety consideration should be used to prioritize the programming of funding. As an example: For improving accessibility – prioritize funding to high crash pedestrian/bike locations, for congestion relief - use traffic crash data to identify intersections and corridors that should be given priority, etc. Further, consider removing the word “promote” and use “take actions” or similar.

Response: We do feel that the strategies included in the Plan are aggressive in advancing safety given the current conditions. Consistent with other more specific comments Safety Strategy A was enhanced to include both promoting and advancing proven safety countermeasures, Strategy B was clarified to note the use of crash history and network screening lists in project evaluation, and Strategy C was expanded to focus on bike/ped safety on both the existing bike/ped network as well as in all projects. It may perhaps be of concern that safety strategies are not included in all applicable goals. That was a deliberate decision, as many strategies do overlap multiple goals and our intention was not to confuse and bloat an already long Plan. So, our solution was to identify primary versus secondary relationships between goals and strategies and then we only listed strategies under a goal if it had a primary relationship with that goal.

Regarding funding, I would point you to Chapter V in the section on the “New Project Evaluation Process,” which does include safety in both a pre-evaluation element as well as in the scoring itself, in what is a much more aggressive process for SJTPO. We will be utilizing this new process with our upcoming TIP. The intent is to include safety, as appropriate in all projects, and substantively in project locations with existing safety issues. We will continue to develop that process in future years based on lessons learned as we roll it out in the upcoming TIP.

We welcome further conversations about additional or more aggressive safety strategies and practices, if needed, for the next update to the Plan.

2. **Comment:** The plan needs to clearly indicate how the priorities, goals, countermeasures, strategies, or projects contained in the HSIP, SHSP, or PTASP are tied to the goals of the SJTPO region.

Response: Language was added describing SJTPO’s ongoing involvement in the Emphasis Area Teams and Steering Committee and that through that involvement will continuously look for ways to improve upon our practices going forward. The Plan includes a strategy on supporting Vision Zero and an explicit strategy noting that we will align our safety investments with SHSP priorities.

3. **Comment:** Numerous references include assisting local governments. The SJTPO should come up with a process that allows funding, specifically federal-aid, to be available to the local governments through a partnership process with the Counties / Cities.

Response: The references to local governments in the plan were meant to include both county and municipal government and not exclusively municipalities. However, SJTPO appreciates the FHWA comment suggesting that municipalities be provided access to federal funds.

As noted, the SJTPO region is suballocated federal STBGP funds for the Atlantic City Urbanized Area, as well as the two other STBGP areas (STBGP-B5K200K and STBGP-L5K). In total this equates to approximately \$13 million annually. With six subregional partners (four counties and two cities), this equates to a little more than \$2

million per subregion, which is significantly less than the identified needs. Furthermore, the counties are not flush with available resources within their planning and engineering departments to take on additional work given their own priorities. SJTPO is not able to commit their limited resources to develop a process that would require the counties to partner with municipalities utilizing the limited federal funds that are available to the SJTPO region.

This coordination does occur organically on a routine basis. The counties work closely with municipalities to identify issues, elevating them as appropriate to the MPO to identify funding. SJTPO will commit to initiating conversations with the counties about the opportunity to work with the municipalities, as appropriate throughout the project planning process to advance projects with a high degree of readiness, deliverability, and value to the region. Together with our MPO partners, SJTPO has been leading the discussion about ensuring municipalities are provided access to federal HSIP funds through the Local Safety Program. In coordination with NJDOT Local Aid, SJTPO will continue explore opportunities to engage municipalities in the region, broadening the access to federal funding sources, such as HSIP, CMAQ, the SRTS program, and TA Set-Aside program.

4. **Comment: The transportation plan is a coordinated effort between the MPO, the State, and the public transportation operator(s) who are members of the Technical Advisory Committee. Please make sure to include any comments received during the coordination between the MPO, the State, and the public transportation operator(s).**

Response: We have been compiling comments from each of these parties all throughout the Plan development process as well as the RTP Public Comment period.

5. **Comment: If the current pandemic conditions do not improve to allow in-person public commenting period, SJTPO should ensure that it is prepared to receive comments from those in underrepresented communities via other possible formats.**

Response: For Phase 2 of public outreach for the Plan, no in-person public meetings were held due to the COVID-19 pandemic. Rather, staff hosted a total of four (4) virtual public meetings; three (3) in English and one (1) in Spanish, as Spanish is the primary Limited English Proficient (LEP) language in the SJTPO region. The Spanish virtual public meeting was made possible with the help of a consultant. The Public Outreach and Engagement Team (POET) at Rutgers, the one-time consultant via the Multilingual Outreach Services Study, researched and provided SJTPO staff with a list of agencies in the SJTPO-region that work with and/or provide support to the underrepresented communities in the region. SJTPO staff contacted twenty-two (22) agencies via telephone and email to inform them of the Spanish virtual public meeting and other ways to provide input on the Plan. Additionally, SJTPO staff created social media posts to inform the public about the English and Spanish virtual public meetings. The posts were promoted via Facebook; meaning through a targeted, paid advertisement, the posts were able to be seen by an audience of SJTPO's choosing. Please note, the Public Outreach portion of the Plan has been updated to include this and further information.

6. **Comment: The plan could have included an in-depth discussion on the role of aviation on goods movement, including financial and employment implications.**

Response: Extensive discussion on the role of aviation on goods movement was added in response to this comment.

Other Comments: Chapter II: Five Critical Transportation Issues in South Jersey

1. **Comment: The Plan mentions that FHWA sub-allocates STBGP funding to areas with populations over 200,000. Furthermore, it mentions that the Atlantic City Urbanized Area is the only area in which those funds can be used. Clarification: Sub-allocated funds are divided into 3 areas:**



- i. **Urbanized areas of the State with a population over 200,000. These funds are distributed among the individual areas based on their relative share of the population. The State and the relevant MPOs may jointly apply to the FHWA division office for permission to base distribution on other factors. These funds may be obligated in the metropolitan area established under 23 U.S.C 134 that encompasses the urbanized area. (23 U.S.C 133(d)(2))**
- ii. **Areas of the State with a population of 5,000 or less. A State may obligate up to 15 percent of the STBG amounts sub-allocated for that year for use in areas with a population of 5,000 or less on roads functionally classified as minor collectors. For areas of 5,000 or less, the construction of a new bridge or tunnel at a new location on a rural minor collector is eligible for STBG funding, subject to the overall 15 percent limit. (23 U.S.C. 133(g))**
- iii. **Areas of the State with a population of 5,001 to 200,000. Prior to obligating funds attributed to an area of this type, the State must consult with the regional transportation planning organizations that represent the area, if there are any. (23 U.S.C. 133(d)(3)) – (page 23)**

Recommendation: Please modify the write-up to reflect the correct distribution of STBGP funds as indicated above.

Response: This section was modified to reflect the distribution described above.

2. **Comment:** The first paragraph, change “disadvantage in communities” to “disadvantaged communities” (page 27)

Response: This change was made.

Other Comments: Chapter III: Existing Conditions and Trends

1. **Comment:** The plan does a good job of explaining the existing status of the multi-modal transportation system and then proposing strategies for improvement in the future. One suggested area of improvement for the plan would be to list the future strategies immediately after the relevant existing conditions discussion.

Response: Thank you for this comment. We will consider this revised organization for future updates.

2. **Comment:** The plan includes a discussion of transportation and land use conditions and trends but it misses an opportunity to provide a robust look at transportation and land use relationships. The plan should have considered discussing the topics in pages 14 - 21 together with topics in pages 30 - 35 to provide an overall vision for transportation and land use in the region. This is also a great opportunity to incorporate county comprehensive plans which provide more robust information on land use.

Response: Additional text addressing transportation and land use connections including references to each of the counties’ most recent Comprehensive/Master Plans, was added in the “Environment” section. We will look for opportunities to expand on this in future plans.

3. **Comment:** Please move the table to the next page or include a table header on the next page? (pages 72 – 73)

Response: This change was made.

4. **Comment:** The plan includes a discussion of Federal requirements – Federal responsible charge and the Federal funds reimbursement process; recommend including in the discussion possible solutions or how

SJTPO is working/planning to work with local agencies to help them in obtaining or using Federal funds. (page 76)

Response: While SJTPO is not in a position to be able to directly change policies and processes discussed as barriers in this section, a paragraph was added talking about SJTPO’s role in coordinating with the appropriate agencies to alter policies and procedures or to identify mitigation, to which SJTPO may be able to play a greater role.

- 5. Comment:** The plan references the FHWA Scenic Byway Program, be sure to mention that funding for the current year was provided under the Reviving America's Scenic Byways Act of 2019. The law required the U.S. Secretary of Transportation to solicit nominations for certain roads to be designated under the National Scenic Byways Program as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities. (page 80)

Response: This change was made.

- 6. Comment:** Please make sure to mention if any of the four Scenic Byway Program applications submitted for this year’s funding were from your region. (page 80)

Response: At the time of the writing of this response, (November 30, 2020), this list of applications nor those selected for funding has not been released yet.

Other Comments: Chapter IV: Vision, Goals, and Strategies: Where Are We Now, and Where Are We Headed?

- 1. Comment:** Even though public input has ranked transportation safety as Goal #7, safety should be part of all the Plan’s goals, as applicable. Consider including a statement that SJTPO incorporates safety considerations into the transportation planning process that includes not only a consideration of safety-related projects and system operations strategies, but also a concern for public education, enforcement, and emergency response for each of the goals defined. Also, can reference page 121. (page 81).

Response: A paragraph was added incorporating this language.

- 2. Comment:** Reference the SHSP 2020 update and update the bike/pedestrian strategies (is available now – check NJDOT’s website). (page 86)

Response: The draft was developed prior to adoption. The strategies were updated to reflect the latest SHSP.

- 3. Comment:** In the sentence, “There are ongoing efforts going across New Jersey to advance bicycle and pedestrian access and safety efforts at the state level, at SJTPO, and at the local county and municipal level,” the word “going” can be deleted. (page 87)

Response: This change was made.

- 4. Comment:** In the sentence, “That work will continue to develop a visionary network, establish standards of what constituted a trail, and to better communicate appropriate facilities to the public,” change constituted to constitutes. (page 88)

Response: This change was made.



5. **Comment: Improve truck routes strategy is listed twice. (page 89)**

Response: The second mention of this—g. Improve truck routes, has been deleted.

6. **Comment: SJTPO’s CMP Activity Report, located in Appendix C, utilizes SJTPO’s approved CMP methodology to produce an updated list of congested locations for 2018 as well as authorized and future congestion relief projects. Do you mean 2020? (page 91)**

Response: The CMP Activity Report included in RTP 2050 did use data from January 1, 2018 through December 31, 2018. This was the latest data available at the time this report was prepared, in the fall of 2019. This list of congested locations was vetted thoroughly by the Technical Advisory Committee.

7. **Comment: Consider incorporating proven safety countermeasures into all pavement projects, as appropriate. (page 92)**

Response: A new strategy was added in Goal 3 to reflect this comment. We will carry this forward into our project evaluation process as a part of the pre-evaluation screening section associated with substantive safety.

8. **Comment: Goal 3 offers an opportunity to discuss the financial details of how much goes towards preservation work whilst comparing it to the needs of the future infrastructure, especially reducing the vulnerability of existing transportation infrastructure. (pages 92 – 97)**

Response: An additional paragraph discussing this was added under Goal 3 in Chapter IV. It should also be noted that much of the details pertaining to the project mix and associated funding are found in Chapter V Funded Projects and Critical Needs, and Chapter VI Financial Plan.

9. **Comment: In the sentence, “While New Jersey counties north of the SJTPO region were harder hit,” change to hit harder.**

Response: This change was made.

10. **Comment: In the sentence, “States have until the spring of 2020,” change to States had... (page 102)**

Response: This change was made.

11. **Comment: Include 2020 SHSP information. (page 108)**

Response: The Draft was developed prior to adoption. This section was updated to reflect the latest SHSP.

12. **Comment: At the bottom of page 108 and the beginning of page 109, language needs to include an introduction for the five points that are mentioned at the beginning of page 109.**

Response: An introduction has been added.

13. **Comment: Last paragraph - HSIP eligibility should be included for the Cities as well and consider including for all levels of government. (page 108)**

Response: Agreed. SJTPO has continually pushed at the state level to ensure that New Jersey’s Local Safety Program remained open to not only MPO subregions but all jurisdictions. While the language only notes projects “in” the four counties, not simply owned by the four counties, we added emphasis, consistent with your comment in this text. We will continue to work to ensure that HSIP remains available to all jurisdictions in our region.

14. **Comment:** Add language to the list to include: “SJTPO’s Local Safety Program will generate safety infrastructure projects by guiding applicants through a five-step process: “(page 109)

Response: An introduction has been added.

15. **Comment:** Strategy a - identifies the highest crash types of the SJTPO region and promotes the FHWA Proven Safety Countermeasures applicable to mitigating those crash types. Consider including an action to incorporate applicable countermeasures into the planning of projects. (page 109)

Response: The strategy was updated to say, “Promote and Advance Safety Countermeasures” and a sentence was added to ensure they are included in projects, as dictated by safety needs.

16. **Comment:** Strategy b – consider expanding on how SJTPO will incorporate safety into all projects. Explain how safety data will be used to identify safety concerns towards mitigation and the highest crash locations will be given priority. Provide a reference to “New Project Pre-Evaluation Screening” on Page 121. (page 109)

Response: The strategy was updated to refer to the Project Pre-Evaluation Screening process, to note that crash history will be used as well as the network screening lists to identify locations with the greatest safety needs.

17. **Comment:** Strategy c – consider expanding bike/pedestrian safety into all projects beyond what is part of the current network. (page 109)

Response: This change was made.

18. **Comment:** The sentence to begin the Transportation Conformity section seems out of place, consider moving to another section, or prefacing it with something else. (page 112)

Response: Additional language was added to the Transportation Conformity section (pages 118-119) to make this a smoother transition.

19. **Comment:** Under Strategies, both (b) and (c) seem to be missing something. For example, Educate the public... and Promote projects... (page 116)

Response: Strategy b under *Goal 9: Protect and Enhance the Environment and Complement Land Use Planning* now reads: “Educate the public about environmental impacts” and strategy c now reads: “Promote projects that reduce emissions.”

Other Comments: Chapter V: Funded Projects and Critical Needs

1. **Comment:** Under A – describe how locations with high crash rankings will be given priority. Consider advancing locations with higher rankings first which may require going to the location owner as opposed to evaluating applications received. (page 121)

Response: Section A of the Pre-Evaluation Screening does not indicate that locations with high crash ranking will receive priority, it only indicates that these locations will receive added scrutiny to ensure that safety issues are addressed. This approach is a notable expansion to our previous practice, and we do not have support at this time for a more stringent approach. We welcome further conversations about this topic.



- 2. Comment: Under C – NJDOT Complete Streets Guide can be used but note that if a government agency has adopted its own policy – that will govern, as applicable. (page 121)**

Response: Section B of the Pre-Evaluation Screening has been updated to include this information.

- 3. Comment: SJTPO has adopted a vision zero goal yet the new project evaluation criteria and scoring does not list safety as its own evaluation criteria. Consider breaking safety out as its own evaluation criteria to illustrate it's a priority for all project planning. (page 123)**

Response: Under “New Project Pre-Evaluation Screening,” in Chapter V, a pre-screening process for all projects that come through SJTPO’s process, “Substantive Safety Considerations are incorporated, as appropriate. Further, within our recently revised Project Evaluation Criteria, under Section I Contributions to Performance-Based Planning Targets, we have as a criterion, “Fatalities and Serious Injuries,” – “To What Degree will the project improve safety for drivers, bicyclists, and pedestrians through the advancement of substantive safety improvements?” Given our pre-screening criteria to evaluate a project for safety, as well as our direct criterion indicated above, we believe we have placed a strong emphasis on safety within our project planning process. (This was also included in an email directly to FHWA, October 23, 2020).

Other Comments: Chapter VI: Financial Plan

- 1. Comment: The FY 2020 – 2029...current available funding, change to currently available funding. (page 149)**

Response: This change was made.

- 2. Comment: Change the first line to - “The current authorizing legislation is the FAST Act, which ~~enacts program authority~~ authorizes surface transportation programs, sets program-specific requirements, and authorizes funds (upper line of credit). (page 150)**

Response: This change was made.

- 3. Comment: Change “*The obligation limitation dictates the actual amount of funds a state may expend*” to “Obligation limitation is the ceiling placed on obligations in a Federal Fiscal Year and is set by Congress. Even though States receive apportionments for the different Federal Transportation programs under the FAST Act, the obligation limitation gives the States authority to obligate those funds.” (page 150)**

Response: This change was made.

- 4. Comment: Change “*An obligation limitation may be given to the states every few weeks*” to “Obligation limitation is distributed to States as continuing resolutions are passed and/or when a full-year appropriations act is passed each Federal Fiscal Year. A State cannot obligate funding on a project or program unless it receives obligation limitation distributed by FHWA.” (page 150)**

Response: This change was made.

- 5. Comment: Change “*On the other hand, the FAST Act determines the apportionments.*” to “On the other hand, the FAST Act determines the apportionments, which are specific program funds that were authorized in the FAST Act (NHPP, NHFP, STBG, etc.). They are apportioned to the States by way of a formula.” (page 150)**

Response: This change was made.

6. **Comment:** Delete the following two sentences – redundant: *Apportionments are the amount of monies per funding program actually allocated to the states. They are set based on formulas established in the FAST Act. Federal funds are appropriated to each state each year based on formulas.* (page 150)

Response: This change was made.

7. **Comment:** Delete the following sentence – not clear: *“The budget is always higher than the apportionment amounts because Congress sets its own budget, which is not based on the apportionments set by the FAST Act.”* (page 150)

Response: This change was made.

8. **Comment:** *“Since the TIP is fiscally constrained, many proposed and necessary projects cannot be included in the TIP.”* - fiscal constrain should not be the reason why proposed and necessary projects are not included in the TIP. Please consider re-phrasing. (page 150)

Response: Federal regulations require Transportation Improvement Programs (TIPs), and Statewide Transportation Improvement Programs (STIPs) to be “fiscally constrained”. The RTP is the appropriate place to list projects that do not fit within the TIP due to the lack of available funding. The RTP also includes the constrained projects. SJTPO has a project evaluation process that established criteria that is used to help determine which projects are not included in the fiscally constrained list. However, there are more needs in the region than funding and as such only a number of projects can be programmed into the TIP due to the need for fiscal constraint.

9. **Comment:** The plan mentions that STBGP is the main funding source for the region. However, when looking at Table 38 – NHPP (\$40.8m) is the largest source of funds compared to STBGP (\$4.1m). Please explain the discrepancy? Did you mean to say the most flexible funding source that can be used for local projects? (pages 153, 157)

Response: The statement indicating that the primary funding source for SJTPO (not the region) is STBGP is correct. The discrepancy or rather clarification to this point is that SJTPO has control over several sources of funding which includes STBGP, CMAQ, HSIP, and the Atlantic City Urbanized funds, but this does not include NHPP, among others. STBGP is the primary funding type for which SJTPO has oversight.

10. **Comment:** Change *“For purposes for projecting future projects expenses in the region, in addition to the projects with the TIP...”* to SJTPO is assuming that project cost will increase at an annual inflation rate of 3.5 percent for projects in the TIP as well as other future project expenses. For long-term construction costs when the letting date is more than a year away, SJTPO is assuming an annual inflation rate of 3.75 percent. (page 160)

Response: This change was made.

Other Comments: Chapter VII: RTP 2050 Performance Report

1. **Comment:** The plan does a good job of listing the adopted performance measures but needs to mention the current status – whether it is on track to meet the targets or not. You can use data from NJDOT or find information at <https://www.fhwa.dot.gov/tpm/reporting/state/state.cfm?state=New%20Jersey>

Response: A discussion of whether each performance measure is on track to meet its respective target has been added Chapter VII.



- 2. Comment: Please also include a discussion of the projects in the plan or dollar amount being spent in the performance area (for example, on bridges) that will help to improve the conditions and/or meet targets.**

Response: This information has been added to Chapter VII: RTP 2050 Performance Report.

- 3. Comment: The link under CMAQ Performance Plan refers to the CMP, please correct. (page 183)**

Response: Sentence has been changed to reference Appendix D.

Other Comments: Chapter VIII: Consultation, Coordination, and Public Involvement

- 1. Comment: In table 54, lowest-ranked strategies 6A and 8H are the same. (page 195). (Maybe just make edit in text that states that some strategies were included under more than one goal.)**

Response: The text in the paragraph above Table 54 was revised to clarify that some strategies were included under more than one goal.

Other Comments: Appendices:

- 1. Comment: Please update the Transportation Conformity report to reflect the current schedule. (Appendix A – pages A22 - 23)**

Response: This change was made.

- 2. Comment: For a detailed list of projects included in the conformity analysis, there is a reference to NJDOT Statewide Projects/Programs and NJ Transit Projects/Programs but these listings only refer to programs. Please explain how you run conformity using program line items? If you selected specific projects for the conformity analysis from these line items, list them separately. (Appendix A1 – page A32)**

Response: As they are all programs, we do not run conformity for these line items. However, the air quality exemption codes are still listed on these pages. The specific projects for which we run conformity are listed in Appendix E2: pages E-33 through E-37.

- 3. Comment: CMAQ Performance Plan needs to be updated to reflect current activities. For example, it was stated in the plan that there will not be a solicitation for FY2020, but there was a solicitation for CMAQ projects for FY2020. (Appendix D):**

Response: The CMAQ performance plan predated the RTP. On page 1 of the SJTPO CMAQ Performance Plan it indicates that an annual solicitation for FY 2019 will not occur. SJTPO did not have an annual solicitation for FY 2020, rather SJTPO issued a solicitation for FY 2022, 2023, and 2024 during FY 2020. The CMAQ MID Performance Period Progress Report that was submitted to NJDOT in September of 2020 provides details of the CMAQ solicitation for future years and other updates regarding previously programmed projects. This report is included as part of Appendix D of RTP 2050.

Federal Transit Administration (FTA) Comments

The following are comments received by SJTPO from the Federal Transit Administration (FTA) and responses thereto. Please note the page numbers may have changed between the original draft and any subsequent revisions, and so the page numbers may not directly correspond to the initial comments made by FTA.

1. **Comment:** Page 23. FTA recommends SJTPO seek input from NJ TRANSIT and other relevant transit agencies on the issues brought up on the last paragraph particularly surrounding equitable transit investment in the state of NJ.

Response: SJTPO has sought input from NJ TRANSIT on the entire “Critical Issues” chapter, of which this section is a part. In a letter to the SJTPO Executive Director dated June 12, 2020, NJ TRANSIT expressed concerns about this section. In response to their initial comments, SJTPO staff made some revisions to this section, which included softening some of the language and suggesting proactive steps SJTPO could undertake to address the issues identified. As communicated to them, the purpose of this chapter is to highlight some of the most important issues our regional partners have found to be barriers in advancing projects. SJTPO has addressed NJ TRANSIT’s concerns in a separate section addressing NJ TRANSIT comments.

In addition to SJTPO’s response, we forwarded this specific FTA comment to NJ TRANSIT. NJ TRANSIT’s response was as follows:

“The main issues raised in this paragraph have to do with transit funding and equity. Please refer to the Inequitable Access – Discrimination and Transit Funding for the SJTPO Region sections of our memorandum of June 12, 2020, where these issues were addressed. We remain open to discussion about these issues. Please let us know if you would like to meet.”

2. **Comment:** Page 23. Last paragraph - *“It is common to point to higher density, ridership, and farebox recovery as a justification for not providing additional transit service. However, consideration of other metrics should be considered as users still need to make trips. This issue is exacerbated”* – NJ TRANSIT shall be consulted on this.

Response: SJTPO forwarded this comment to NJ TRANSIT. NJ TRANSIT’s response was as follows: “NJ TRANSIT would be happy to engage in a two-way discussion with SJTPO about any additional considerations you would propose.”

3. **Comment:** Page 24. How Can SJTPO Help? - Consider encouraging subregions to seek other funding sources for transportation improvements.

Response: SJTPO will work with subregions to explore other funding opportunities outside of efforts to correct the funding inequities described in this section.

4. Page 27.

- a. **Comment:** Regarding this statement – *“SJTPO states that the consistent themes they heard over the years from the public is the discrepancy between transit funding and population or lack of adequate transit service”*, FTA recommends seeking input from NJ TRANSIT and other relevant transit agencies on these issues

Response: SJTPO forwarded this comment to NJ TRANSIT. NJ TRANSIT’s response was as follows:

“Over the years, SJTPO has forwarded such comments to NJ TRANSIT, and NJ TRANSIT has provided responses. We have offered, on more than one occasion, to work with SJTPO to identify potential transit markets and appropriate transit solutions, and that offer stands.”



- b. **Comment:** The following statements are not necessarily true. Bullet 2 shall be discussed with NJ TRANSIT and other relevant transit agencies.

— *“This combined with the dichotomous reality that state and federal transportation resources are less likely to flow into the region than other parts of the state, creates a major and sustained source of inequity” “And in no place is that inequity on greater display than in public transit. Figures 11 and 12, below, show the discrepancy between funding in public transportation and persons in the three MPO regions in New Jersey”.*

Response: The issues communicated in Issues #1 and #3 center around the issue that relative to all of the metrics described in Issue #1 (population, seasonally adjusted population, vehicle miles travelled, roadway mileage, or persons in poverty) the SJTPO region does not receive funding in proportion to its needs relative to the rest of the State, particularly pertaining to transit. This paragraph was removed from the latest version of the RTP 2050 in order to soften the approach.

5. Page 27-28.

- a. **Comment:** The RTP stated - *“This means making transit appealing for high wage workers through higher speed service, such as rail, with fares lower than the cost of driving and parking”.* – SJTPO shall seek input from NJ TRANSIT and other relevant transit agencies on that.

Response: SJTPO forwarded this comment to NJ TRANSIT. NJ TRANSIT’s response was as follows:

“NJ TRANSIT does not gage the speed of service on customers’ income. While we seek to provide the best service possible, factors that affect the speed of service such as the provision of express service are based on our ability to move volumes of people as effectively as possible, physical conditions and other constraints. NJ TRANSIT fares are based on the cost of operating service and the availability of state operating subsidies to cover the shortfall between ticket revenues and operating costs. Fares are not based on pricing of competitive modes.”

- b. **Comment:** Please consider revising these statements in the plan. They appear to be based on opinions and not necessarily object statements. Consult with NJ TRANSIT and other relevant transit agencies also. Words such as biased, choice riders, poorer, wealthier and whiter; etc. should be avoided in the plan –

— *“This discrepancy is explained by three factors, the greater population densities, which lead to greater ridership and subsequently more revenue for routes in North Jersey, federal transportation funding formulas, which are biased towards large urban areas, and the propensity for transit agencies to focus on reducing roadway congestion by competing to attract choice riders that commute to major urban centers, such as New York and Philadelphia. This means making transit appealing for high wage workers through higher speed service, such as rail, with fares lower than the cost of driving and parking. While the reduction in congestion and emissions is a commendable goal, it often comes at the expense of low-income riders, who by and large utilize bus transit for their daily needs. Figure 13 and Figure 14, below, show that nationwide rail transit users are wealthier and whiter and bus transit users are poorer and more often minority users”.*

Response: As mentioned above, NJ TRANSIT was consulted on Chapter 2: Critical Issues, and revisions were made based on their comments. However, the use of these particular words remains valid. Funding formulas favor larger urban areas, which, as is seen in New Jersey, are receiving funds in excess of their population, seasonally adjusted population, vehicle miles travelled, roadway mileage, or persons in poverty. Choice riders is a commonly used term in planning, simply referring to those who use transit as a

choice – to avoid congestion for example – as opposed to users who ride transit based on necessity – due to not owning an automobile for example. The words poorer, wealthier, and whiter are not stated as opinions, but reflect directly on the charts referenced in that sentence.

6. Page 29.

- a. **Comment:** SJTPO shall consult with NJ TRANSIT and other relevant transit agencies on bus shelter construction and maintenance and local government funding requirements for the bus stops.

Response: SJTPO has added language on the “HOW CAN SJTPO HELP?” dialogue box. In addition, this comment was forwarded to NJ TRANSIT, who responded as follows:

“NJ TRANSIT would be happy to meet with SJTPO to discuss our Bus Stops, Signs & Shelters program and related matters.”

- b. **Comment:** Regarding this sentence; *“Additional transit services to accommodate low-income residents in the SJTPO region are needed, as they have greater mobility barriers to transit services relative to residents in more densely populated metropolitan regions.”*- SJTPO shall consult NJ TRANSIT and other relevant transit agencies regarding this.

Response: SJTPO has added language on the “HOW CAN SJTPO HELP?” dialogue box. This comment was also forwarded to NJ TRANSIT, who responded as follows:

“Please refer to the Local Community Mobility Programs section of our memorandum of June 12, 2020, where this issue was addressed. We remain open to discussion about this issue, as well.”

7. **Comment:** Page 31. Typo – 2nd to the last line in the 2nd to the last paragraph – “project” – should say “protect”.

Response: This change was made.

8. **Comment:** Page 37. Under the heading “Public Transit”, *“Although transit service is available in every county of the SJTPO region, it is generally sparse due to low population densities.”* – This is more of a demand and supply issue.

Response: Slight addition made to sentence.

9. **Comment:** Page 42. Typo in the heading - The Five-Mile Beach Eclectic Railway Company. File should be “Five”.

Response: This change was made.

10. **Comment:** Page 45. There should be a mention of the current efforts to update the CHSTP in 2020.

Response: The 2020 Update to the CHSTP, known as the Access for All Transit Plan, is described in Chapter IV under Human Services Transportation: Looking to the Future.

11. **Comment:** Page 65. FTA recommends providing the potential effects of sea rise and storm surge, the vulnerability and resilience of transit facilities and measures *(if any)* to address the issue.

Response: Additions were made to Chapter III Existing Conditions and Trends and Chapter IV: Vision, Goals and Strategies: Where are We Now and Where are We Headed? to address this comment.



12. **Comment:** Page 73. Under Housing and Economics, - *“Vehicle ownership is a necessity due to the lack of transit in the region and as such”* – Consider using another word other than “lack” of transit. The word gives the impression that the region is without transit.

Response: “Lack of transit” has been replaced with “relatively sparse transit coverage.”

13. **Comment:** Page 75. Transit as a means of Equity - *“it is important to note that funding for public transportation in the SJTPO does not keep pace with one of any number of regional characteristics, as 8.7 percent of persons in poverty in New Jersey live in the SJTPO region and 6.4 percent of the year-round population lives in the region, only 2.7 percent of NJ TRANSIT funding between 2004 and 2019 have been spent in the SJTPO region”*; SJTPO shall discuss this with NJ TRANSIT.

Response: See Response #1 above. This entire issue and associated statistics were presented as part of Chapter II: Critical Issues, which was vetted through NJ TRANSIT prior to release of the entire RTP. In addition, SJTPO forwarded this comment to NJ TRANSIT, who responded as follows:

“Again, please refer to the Inequitable Access – Discrimination and Transit Funding for the SJTPO Region sections of our memorandum of June 12, 2020, where these issues were addressed. As stated above, we remain open to discussion about these issues.”

14. **Comment:** Page 76. **“Policy and Process: Barriers to Equity”** – and the policy of NJ TRANSIT to leave the responsibility of bus shelter maintenance to local municipalities as a condition of construction. See comment 5a.

Response: Similar to comment #6a (we think you meant comment “6a” in the comment above), we added language in this section reflecting consultation with appropriate agencies on each of these issues.

15. **Comment:** Page 82. Under – **“Public Transit: Looking to the Future”** – FTA commends efforts to engage NJ TRANSIT in determining potential for a BRT.

Response: Thank you.

16. Page 84.

a. **Comment:** Paragraph 1 – *“Designation of a project sponsor and identification of funding sources remain outstanding issues”* – FTA recommends consulting with NJ TRANSIT to address this.

Response: This language was taken directly from NJ TRANSIT. We have and will continue to consult with NJ TRANSIT on this project.

b. **Comment:** Under the heading **“Human Services Transportation: Looking into the future”** – FTA commends SJTPO’s efforts to recommend service and strategies that will address the identified needs in the proposed All Access Plan.

Response: Thank you.

17. **Comment:** Page 85. *“It should be noted that some of these recommendations have been implemented since the completion of the 2015 Coordinated Human Services Plan, particularly the feeder services now provided by SJTA,”* - FTA recommends highlighting the recommendations from the plan in reference that have been implemented.

Response: The Access for All Transit Plan, SJTPO’s update to the 2015 Coordinated Human Services Transportation Plan (CHSTP), lists the recommendations from the 2015 CHSTP. This Plan is expected to be adopted by SJTPO’s Policy Board in March 2020.

18. Comment: Page 107. Under the heading “Safety Outreach and Education” - Consider connecting or explaining how this part of the report ties into the Public Outreach to LEP population in the region.

Response: Language has been added to clarify how SJTPO works with the under-represented in the region, specifically teen parents and child services organizations to ensure the correct use of child restraint systems of school buses and organization-owned vehicles.

19. Comment: Page 141. Unmet Critical Needs – Consult with NJ TRANSIT and all other relevant public transit agencies in the region on this list.

Response: As a member of the Technical Advisory Committee, the list of unmet critical needs along with the entire RTP was shared with NJ TRANSIT. The unmet critical needs of the other relevant public transit agencies in the region are included in the *Access for All Transit Plan*, described in #17, above. In addition, this comment was shared with NJ TRANSIT, who responded as follows:

“NJ TRANSIT is preparing to undertake a study that is intended to determine if it is possible to increase service on the Atlantic City Line (ACL) utilizing existing, available infrastructure. At the time of this writing, the procurement process for this study is just commencing. When the study is ready to begin, we will reach out to SJTPO for input. Similarly, NJ TRANSIT is in discussions with SJTA about the potential for a jointly funded study of the feasibility of a new ACL station in Pomona for the Atlantic City Airport. Regarding the bus services listed as unmet needs, as stated above, NJ TRANSIT will be happy to work with SJTPO to identify potential transit markets and appropriate transit solutions.”

20. Comment: Page 157. Funding Resources - Consult with NJ TRANSIT and all other relevant public transit agencies in the region mostly on state of New Jersey transit funding.

Response: This comment was shared directly with NJ TRANSIT, who responded as follows:

“NJ TRANSIT will be happy to engage in a discussion about transit funding.”

21. Comment: Page 162. Under RTP 2050 PERFORMANCE REPORT, discuss the progress of the region towards compliance with the requirements of the Public Transportation Agency Safety Plans (PTASP - 49 CFR Part 673) and how that progress will be tracked and reported.

Response: SJTPO added language in Chapter VII: RTP 2050 Performance targets which includes transit safety targets from NJ TRANSIT’s Public Transportation Agency Safety Plan (PTASP) for its Bus Operations, as well as how progress towards attainment of these targets will be tracked. NJ TRANSIT also released a PTASP for the River Line; but, as the River Line is located outside the SJTPO region, measures and targets from that Plan was not discussed in RTP 2050.

22. Comment: Page 184. FTA commends including FTA TAM Performance Measures in the plan.

Response: Thank you.

23. Comment: Page 187. FTA commends including FTA PTASP Performance Measures in the plan. Note - As a rule, MPOs have 180 days from the from receipt of the agency’s safety performance targets to prepare their initial public transportation safety performance targets (23 CFR. § 450.306d (3)) This applies only to initial targets. Note that the first MTP update or amendment to be approved on or after July 20, 2021, is required to



include the MPO’s transit safety targets. Please also note that the deadline has been effectively extended to December 31, 2020 due to the COVID-19 pandemic.

Response: Thank you and the extension of the deadline is duly noted.

24. **Comment:** Page 187. Under VIII. CONSULTATION, COORDINATION, AND PUBLIC INVOLVEMENT, consider including how implementation of this section changed or was/still continues to be affected by COVID-19.

Response: SJTPO revised the section to include information on how the Organization adapted because of the COVID-19 pandemic, namely the purchase and use of the GoToMeeting and GoToWebinar online conferencing platforms for public meetings.

25. **Comment:** Page 188. Under SJTPO Policy Board, FTA recommends having a citizens' representative be a member of the Board to enhance robust public participation and decision-making process at SJTPO.

Response: SJTPO is actively working to establish a new committee, to be known as the Community Outreach and Engagement Committee (COEC). This committee will be established under a new name (formerly the Citizens Advisory Committee), with new members, and under a new set of bylaws in the Spring of 2021. The committee is intended to better represent the region’s diverse population while sharing information and receive feedback on SJTPO activities and projects. Through a recent technical study effort, SJTPO is enhancing our contacts and communication efforts to a broader set of community outreach organizations and those who are traditionally underserved in the transportation planning process. Through these efforts and activities, it is our hope that SJTPO can accomplish the robust public participation noted in the spirit of FTA’s comment. Simultaneously, SJTPO will engage our Technical Advisory Committee and Policy Board members in conversations about incorporating the public in the decision-making process within the organization.

26. **Comment:** Page 191. Public Involvement – This section maybe missing information on LEP outreach. Consider providing additional information on how people with LEP involved in the public outreach process particularly in the context of COVID 19 and lessons learned. Compare with Plan 2040 lessons.

Response: Thank you for the comment. When the Draft RTP 2050 was released for public comment, the Public Involvement section was incomplete because Phase 2 of outreach was ongoing. Staff has since updated the section to include all information relative to Phase 2 of outreach, including the Spanish virtual meeting that took place on Wednesday, December 9, 2020 from 6:00 PM to 7:00 PM. Additionally, staff would like to mention that since the adoption of RTP 2040, staff has significantly expanded its outreach to populations with Limited English Proficiency. Information on SJTPO’s outreach to populations with LEP can be found in SJTPO’s recently adopted Limited English Proficiency (LEP) Plan, www.sjtpo.org/LEP.

27. **Comment:** Page 196. Again, as stated in question 15, consider using another word other than “dearth” of public transit in the concluding paragraph. The word gives the impression that the region is without transit.

Response: The text has been modified to remove the word “dearth.”

New Jersey Department of Transportation (NJDOT) Comments

The following are comments received by SJTPO from the New Jersey Department of Transportation (NJDOT) and responses thereto. Please note the page numbers may have changed between the original draft and any subsequent revisions, and so the page numbers may not directly correspond to the initial comments made by NJDOT.

1. **Comment:** Page 29. NJDOT commends SJTPO for the last paragraph on the page, as equity is a critically important topic in planning that must be emphasized.

Response: Thank you.

2. **Comment:** Page 35. The paragraph at the bottom of the page begins “As it is in all developed areas.....” This is a blanket statement that should be narrowed down to be more specific. Perhaps by adding “in the SJTPO region” or “in New Jersey” or similar. It is not a universally true statement.

Response: Language stating, “As it is in all developed areas” was removed. The sentence now reads, “The dominant mode of travel in the SJTPO region is the automobile...”

3. **Comment:** Page 37-38. Under the sub-heading of *Local and Intrastate Bus Service*, the Atlantic City Jitneys and Shoreline Bus Service are discussed. Then on page 40 under the sub-heading of *Other Bus Service*, the same information on the Atlantic City Jitneys and Shoreline is repeated.

Response: The information under “Other Bus Services” was moved to the Local and Intrastate Bus Service section, with any duplications deleted.

4. **Comment:** Page 49. NJDOT supports the desire for a bicycle level of traffic stress inventory for the SJTPO region.

Response: SJTPO sincerely appreciates NJDOT’s support.

5. **Comment:** Page 51. In the second paragraph, “NJDOT” should be changed to “New Jersey” as NJDOT is not a state. Alternatively, instead of using “states,” “state agencies” may be used while keeping “NJDOT.”

Response: This change was made.

6. **Comment:** Page 62. NJDOT recommends briefly discussing the results of the consultation between NJDOT and rail operators/regional planning organizations to add more information.

Response: SJTPO was not a direct part of the effort described in this comment We have added the information for which we have direct knowledge. We welcome conversations with NJDOT and others on this effort and can memorialize that in the next RTP, as appropriate.

7. **Comment:** Page 74. Near the end of the last paragraph, it is not clear what “half the access to mental health providers” is referring to as there is no comparison here.

Response: This sentence was updated to note that residents have half the access to mental health providers as residents of the state as a whole.

8. **Comment:** Page 82. Under the sub-heading *Roadway System: Looking to the Future*, there is a sentence that implies that there is gambling in Cape May County. This should be corrected.

Response: This change was made.



9. **Comment:** Page 82. NJDOT supports the inclusion of “Improve security” as a goal but recommends that SJTPO expand on the goal’s title as “security” alone can be too vague.

Response: Further information and explanation of this goal is included in the paragraph underneath Goal 10. Improve Security in Chapter IV. SJTPO’s goals were crafted based on the 10 Metropolitan Planning Factors as outlined in the FAST Act. As the goals were set and fully vetted more than a year ago, prior to the actual drafting of RTP 2050, SJTPO believes it is too late to change the actual goals now but will consider modifying and building upon this goal in any future updates.

10. **Comment:** Page 82. The second paragraph under the *Roadway System* sub-heading states that SJTPO “has made many improvements” such as adding travel lanes to the Garden State Parkway and Atlantic City Expressway, as well as elevating roadways and bridges. Since SJTPO did not actually make those improvements the paragraph should be rephrased.

Response: Paragraph rephrased, per comment.

11. **Comment:** Page 89. The final strategy on the page mentions the “SJTPO process” but it is unclear what process is being referred to.

Response: This process refers to the SJTPO’s Project Evaluation process, which is described in detail in Chapter V. Language has been added to the strategy to clarify this.

12. **Comment:** Page 90. Under the sub-heading *Congestion Management Process*, SJTPO is referred to as a TMA. However, “TMA” is defined earlier in the document as a Transportation Management Association, which does not apply to SJTPO.

Response: Language added to clarify that TMA in this context refers to “Transportation Management Area.”

13. **Comment:** Page 95. Under the *Other Regional Initiatives* bullet, the phrase “NJDOT should” must be removed as a directive statement. Please rephrase this sentence.

Response: Sentence rephrased, per comment.

14. **Comment:** Page 111. There is a sentence that says “the Subregional Transportation Planning Work Program, also known as the UPWP.” The UPWP is the “Unified Planning Work Program.” This should be corrected.

Response: This change was made.

15. **Comment:** Page 152. Under the heading *Federal Funding Sources for the SJTPO Region*, there is no mention of the Metropolitan Planning Funds (FHWA-PL, FTA-PL and STBGP) which fund SJTPO’s staff and planning studies for the region. You may want to include this.

Response: Table 35 has been modified to include entry describing Metropolitan Planning Funds.

16. **Comment:** Page 177. NJDOT appreciates SJTPO’s inclusion of a link to NJDOT’s TAMP document.

Response: Thank you.

Miscellaneous grammatical errors and typos

17. **Comment:** Throughout the document there are examples of inconsistencies. For example, “The New Jersey shore” is also written as “the Shore,” “the New Jersey Shore,” “the shore” and “the Jersey Shore.” NJ State Highways are identified as Route 47, NJ 47 and NJ-47. The way time is depicted varies as seen here: “*The peak travel hours are defined as 6-10 AM on weekday mornings, 3:00 PM to 7:00 PM on weekday afternoons.*” To improve the overall quality of the document, these should be made consistent.

Response: Revisions made. All references to the “New Jersey Shore” are now “Jersey Shore.” All references to “Route 47” are now “NJ 47,” and any references to specific times include the full hours and minutes, e.g. 3:00 PM to 7:00 PM.

18. **Comment:** Throughout the document there are inconsistencies in handling of numerals. Sometimes they are written as a word as in “two phases” and sometimes written with the numeral as in “2 months.” A simple rule for using numbers in writing is that small numbers ranging from one to ten should be spelled out while numbers above ten are written as numerals.

Response: Numbering was reviewed and corrected, as needed.

19. **Comment:** Throughout the document there are inconsistencies in hyphenation. For example, “*Although some of the five-year rolling average targets above indicate an increase, this is due to annual levels for 2014 that were relatively low. 5-year rolling averages after that date lose the benefit of 2014, resulting in higher 5 year rolling average values.*” Similarly, “sea level” is sometimes written “sea-level,” “low income” is written “low-income,” etc. To improve the overall quality of the document, these should be made consistent.

Response: Hyphenation use was reviewed and corrected, as needed, to be grammatically appropriate.

20. **Comment:** Page 27. In the first sentence on the page, “pockets of highly concentrated disadvantage” sounds strange and should be revised.

Response: The statement is written using common terminology for the topic. We considered alternate phrasing but were not able to find more effective equivalent language.

21. **Comment:** Page 45. “Five-Mile” is incorrectly spelled “File-Mile.”

Response: This change was made.

22. **Comment:** Page 48. The second sentence begins with “First” but no preceding sentences begin with “Second.”

Response: This change was made.

23. **Comment:** Page 49. There is an unnecessary repetition of words in the second paragraph under the sub-heading *Gaps in the System*.

Response: Wording has been revised to be less repetitive.

24. **Comment:** Page 50. In the second sentence on the page, the word “network” or “system” should be inserted after “Circuit Trail.”

Response: This change was made.



25. **Comment:** Page 51. In the second sentence on the page, “if not exclusively” is a strong claim that should be removed.

Response: This clause removed.

26. **Comment:** Page 56. The second mention of “Atlantic City International Airport” should be simply shortened to “airport.”

Response: This change was made.

27. **Comment:** Page 56. In the last paragraph on the page, the colon should be removed following “include.”

Response: This change was made.

28. **Comment:** Page 62. In the first paragraph on the page, the word “truck” should be inserted between “severe” and “parking.”

Response: This change was made.

29. **Comment:** Page 65. The *Sea-level Rise* paragraph should be revised. It reads like a repetitive listing of facts rather than a clear narrative. The phrase “1.5 feet per century since 1965” should be corrected. Also, in the pull-out quote on the side of the page, “in” is incorrectly spelled as “is.”

Response: Paragraph rewritten, and correction made in pull-out quote, per comment above. Lenore Tedesco’s quote pertaining to a sea level rise rate of 1.5 feet per century since 1965 was unchanged, as that is a direct quote from her per an article published on July 31, 2019 in the [Ocean City Sentinel](#). Please let us know if you would like us to forward you a copy of the exact article.

30. **Comment:** Page 67. In the second paragraph on the page, “in the inventory” should be removed.

Response: This change was made.

31. **Comment:** Page 69. In the first sentence on the page, it is unclear what “Given the consensus and understanding” and “this problem” is referring to since there is a new heading.

Response: This sentence was rewritten to provide more context behind this language.

32. **Comment:** Page 72. In the paragraph under the sub-heading *Transportation*, “In addition” should be changed to “Second” as there is a “First” preceding it.

Response: This change was made.

33. **Comment:** Page 74. The first sentence under *Health and Environment* could be reframed as it is currently written in the passive voice.

Response: Sentence rewritten in active voice.

34. **Comment:** Page 75. The final sentence on the page is missing the word “region” after SJTPO.

Response: This change was made.

35. **Comment:** Page 76. The third sentence on the page should be rewritten to say “They are largely well-intended, and any negative consequences are generally unintentional.”

Response: This change was made.

36. **Comment:** Page 76. The first sentence of the second paragraph is awkward and can be made more concise.
Response: The sentence was revised to be more succinct.
37. **Comment:** Page 77. In the first paragraph under the heading *Environment*, there are several words that are unnecessarily capitalized: Coastal, Wildlife, Prime, Forested and Unique.
Response: This change was made.
38. **Comment:** Page 83. In the last paragraph on the page, “environmental study” should read “environmental impact study.” Also, the “South Jersey Bus Rapid Transit System” should be written as an acronym following the initial mention.
Response: This change was made.
39. **Comment:** Page 85. The phrase “to Port Norris residents” should be written as “for Port Norris residents”
Response: This change was made.
40. **Comment:** Page 87. The information about the NJ SHSP (page 86) should be under *Statewide Efforts* on this page. Also, the NJ SHSP update is now complete and the final RTP should reflect this.
Response: This section was merged with the next section so that the SHSP would fall under Statewide Efforts. References to the 2015 SHSP, which was current when this Plan was drafted, have been updated to reflect the 2020 Plan.
41. **Comment:** Page 90. At the top of the page, “employee access to employment” should be rewritten as “employment access.”
Response: This change was made.
42. **Comment:** Pages 100 and 115. The paragraphs discussing adaptation and mitigation are repeated.
Response: The paragraph on page 115, under Environmental Mitigation, was deleted.
43. **Comment:** Page 105. There are a few improvements that could be made in the first two paragraphs. The phrase “not so pleasant” should be changed; “seasonal roadways” doesn’t sound right; “NJDOT” should not be referred to as “who;” and “which makes sense” should not be used.
Response: This change was made.
44. **Comment:** Page 106. The correct style of writing for a document such as the RTP is to use the formal writing voice. Therefore, the use of first-person pronouns (I, me, my, we, us, etc.) is not acceptable. The first paragraph under *Goal 7* should be revised or removed.
Response: The language used was important to communicate the point that all of us need to decide whom among our family and friends we are willing to lose. SJTPO is equally part of the “us.” The language has been pulled out to a call-out but remains, as SJTPO made the determination that the language was acceptable and appropriate.
45. **Comment:** Page 107. In the list of bullets, “Transporting Children Safety” should be “Transporting Children Safely.”
Response: This change was made.



46. **Comment:** Page 109. The five-step project selection process needs a lead-in sentence.

Response: This was addressed as part of FHWA comments.

47. **Comment:** Page 119. Under *Funded Projects and Critical Needs* the last sentence of the first paragraph is not a complete sentence.

Response: This change was made.

48. **Comment:** Page 122. Under *F. Air Quality Assessment*, the word “been” is missing prior to “evaluated.”

Response: This change was made.

49. **Comment:** Page 122. At the bottom of the page the spelling of “judgement” should be corrected.

Response: This change was made.

50. **Comment:** Page 170. Under *Pavement Measures and Targets*, “roads or infrastructure” should be used in place of “pavements.” In addition, the casual phrase “in the loop” should be replaced with the word “updated.”

Response: This change was made.

51. **Comment:** Page 179. In a few instances the acronym “TTTR” is incorrectly written “TTR.”

Response: This change was made.

52. **Comment:** Page 186. In the last sentence under *Performance*, “itself” should be replaced with “the agency.”

Response: This change was made.

53. **Comment:** Page 196. “So, there has been strides” should be rewritten “There have been strides...”

Response: This change was made.

New Jersey Transit Corporation (NJ TRANSIT) Comments

The following are comments received by SJTPO from the New Jersey Transit Corporation (NJ TRANSIT) and responses thereto. Please note the page numbers may have changed between the original draft and any subsequent revisions, and so the page numbers may not directly correspond to the initial comments made by NJ TRANSIT.

1. **Comment:** NJ TRANSIT is concerned that SJTPO’s first and third issues include critical statements asserting under-investment and inequity. *1. Funding Imbalance: The proportion of transportation funding to SJTPO jurisdictions is not in balance with population, seasonally adjusted population, vehicle miles travelled, roadway mileage, or persons in poverty. 3. Inequitable Access: Vulnerable communities in the SJTPO region generally do not have equal access to mobility for their daily needs and face inequitable burdens to improve mobility.*

NJ TRANSIT disagrees with these assertions, and also suggests that SJTPO’s document presents data, tables, and graphics that are, in parts, inaccurate or incomplete, or which can be taken out of context.

Response: SJTPO has carefully reviewed and vetted all of its data that went into the draft RTP 2050. In addition, Chapter 2, the Five Critical Transportation Issues in South Jersey, was reviewed and vetted by our subregions. As practitioners of a data-driven and rational planning process, in conjunction with professional judgment, we have

conveyed what we believe to be an accurate portrayal of some of the most critical issues identified by our planning partners facing the regional transportation system.

2. **Comment: INEQUITABLE ACCESS – DISCRIMINATION**

NJ TRANSIT is compliant with Title VI of the Civil Rights Act of 1964 and maintains a program of activities to assure that agency activities are compliant and reporting requirements are met.

- **As part of our Title VI efforts, NJ TRANSIT regularly evaluates our services to ensure equity.**
- **All major service changes must take into consideration the impact to minority and low-income customers.**
- **NJ TRANSIT regularly monitor service between minority and non-minority areas to ensure they meet the Federal Transportation Administration (FTA) - approved service standards and service policies.**
- **These procedures ensure that the distribution of our services is conducted in an equitable manner.**
- **The FTA’s triennial reviews have regularly affirmed NJ TRANSIT’s approach and performance.**

Response: Inequitable access to transit was a significant issue within our regional transportation system identified by our planning partners, as well as the public. This issue raised in the Plan is not a determination of whether NJ TRANSIT meets FTA’s Title VI assessment but reflects the equity concerns that have been raised in our region. Indeed, we do acknowledge in the Plan NJ TRANSIT’s continued compliance with Title VI of the Civil Rights Act. Inequitable access is a challenge faced by all transportation professionals within the region.

3. **Comment: TRANSIT FUNDING for the SJTPO Region**

NJ TRANSIT fully recognizes and is committed to our obligation to serve the entire State as efficiently and effectively as possible within our limited financial and other resources. NJ TRANSIT’s annual capital program for the SJTPO region is consistent with the Federal Transit Administration (FTA) formula funds distribution.

- **FTA apportions funds to states and designated recipients according to a statutory formula using the U.S. Census and National Transit Database (NTD) data and apportioned across the Urbanized Area (UZA).**
- **For the 5307 allocation, UZAs with populations less than 200,000, the formula is based on total population and population density.**
- **Because of lower population densities and lower travel demand, the majority of transit services in the SJTPO region require a greater subsidy per passenger that those in other regions.**

SJTPO’s report did not include important NJ TRANSIT programs aimed at supporting existing local transit services that are best suited for low density areas, which characterize large portions of the SJTPO region.

Response: As part of Chapter III Existing Conditions and Trends, under “Local Community Mobility Services,” we include an extensive discussion of the community shuttles that are operated by the SJTA in partnership with the CCCTMA. We also include an extensive discussion of the shuttle services administered and operated by the counties within our region.

4. **Comment: TRANSIT ACCESS IN THE SJTPO REGION**

Bus

As noted above, NJ TRANSIT fully recognizes our obligation to serve the entire State as efficiently and effectively as possible with our limited financial resources. We accomplish this with a network of bus



services throughout South Jersey, serving all major population centers and spreading out through suburban and some rural areas of the region to the extent that ridership can support the operation.

- NJ TRANSIT operates 253 bus routes in our statewide system. 60 of these routes operate in South Jersey (Mercer County and points south).
- South Jersey service comprises 22% of the overall service hours, 29% of the overall bus miles and 19% of the overall number of bus trips, but the region accounts for only 13% of the overall bus passengers and 13% of the overall revenue.

Statistics show that South Jersey receives a fair share of service, based upon final FY 2019 (ending June 30, 2019) operating and financial statistics. Evaluating South Jersey bus ridership and revenue performance by key metrics indicates that South Jersey services perform well below the level achieved by North Jersey bus services. This is due to the much lower overall population and population density, coupled with a more "spread-out" landscape of passenger generators due to the limited number of urban concentrations in South Jersey.

- South Jersey bus routes carry 12.4 passengers per hour compared with 24.2 passengers per hour in North Jersey.
- South Jersey bus routes carry 22.4 passengers per trip compared with 35.9 passengers per trip in North Jersey.
- South Jersey bus routes carry 0.7 passengers per mile compared with 1.8 passengers per mile in North Jersey.
- The fully allocated farebox recovery rate for South Jersey bus routes is 24% compared with 47% in North Jersey.
- The fully allocated subsidy per passenger for South Jersey bus routes is \$8.47 compared with \$3.09 in North Jersey.

Seasonal Distribution:

NJ TRANSIT significantly expands service seasonally in the South Jersey shore areas. We operate two bus routes (#316 Philadelphia-Wildwood-Cape May Express and #510 Wildwood-Rio Grande) which only exist during the summer months and we also significantly add service to two other bus routes (#319 New York-Atlantic City-Wildwood and #551 Philadelphia-Atlantic City) during the summer months.

Response: It is important to note that the SJTPO region only includes Atlantic, Cape May, Cumberland, and Salem counties, so an assessment including counties as far north as Mercer may miss the point discussed in the Plan. As stated above, however, we have used carefully vetted data that supports Critical Issue #1: the Funding Imbalance and Critical Issue #3: Inequitable Access. That being said, however, we do not dispute the statistics on service volume or subsidies you describe above. We recognize that the much higher subsidies and lower farebox recovery for South Jersey bus routes do present challenges for NJ TRANSIT to increase service in the SJTPO region. However, we are concerned that these arguments alone miss the point discussed in the Plan. We recognize that the SJTPO region is lower in density and as a result has lower ridership, lower farebox recovery, and thus require greater subsidy. The argument posed in the Plan is that the region is disadvantaged, residents have lesser means to afford mobility, more affordable mobility via transit is less available, and regardless of why mobility is less available, it creates a burden for residents in the region. Further, despite this greater subsidy, the overall investment in transit in the SJTPO region still appears to fall short, so given NJ TRANSIT's argument that essentially transit costs more in South Jersey per unit cost, it suggests that transit service may fall short beyond what has been communicated in the Plan. The lack of sufficient transit access is meant to highlight a major challenge facing the SJTPO region and we hope future conversations can take place to remedy or mitigate the concerns discussed in the Plan.

We have reflected the summer only bus routes in Chapter III Existing Conditions and Trends. That being said, however, based on an analysis of regional demographics and the greater preponderance of persons in poverty residing in the SJTPO region relative to the rest of the state as well as a huge influx of population during the summer months, the demand for public transit within our region still far outweighs the supply.

5. **Comment:** Rail

NJT is committed to continued and improved service on the Atlantic City Line.

- **The revised schedule implemented when service was restored in 2019 was developed with input from the Casino Association regarding labor shifts, line employees and supervision, and was responsive to customer requests for better service.**
- **The new schedule requires fewer locomotives and is less vulnerable to staffing issues than the previous schedule.**
- **The new pattern also makes it possible to better serve the entire line with event service.**
- **NJ TRANSIT always seeks to be responsive to requests to increase capacity, either by lengthening or adding trains where demand warrants and logistics permits.**

Local Community Mobility Programs

NJ TRANSIT's Local Programs, Minibus Support and Community Mobility group is responsible for pass-through federal and state funding as well as training and technical support to all counties in the SJTPO region. These funds provide community-based transportation services for senior citizens, people with disabilities, low income and the general public. These local services greatly extend the reach of transit beyond NJ TRANSIT's larger vehicle, trunk line system of routes, with appropriately sized vehicles that more effectively serve lower density areas with smaller transit markets.

- **The estimated amount of yearly pass through federal, state and NJT funds is \$4,741,415 in the SJTPO region. For 2020, there will be an additional \$2,791,746 Coronavirus Aid, Relief, and Economic Security (CARES) Act for Section 5311 subrecipients, therefore the total distributed to SJTPO region for 2020 is estimated to be \$7,533,161.**

Unfortunately, these local transit services are not reflected in SJTPO's document or shown on the document's map. This creates a false impression of large "transit deserts" in the SJTPO region, when in fact, the program's support of county operators extends to all four counties in the SJTPO region. We suggest that SJTPO's maps and other documents that are used to conclude that additional transit services are needed include the community-based services in your analyses.

Response: As part of Chapter III Existing Conditions and Trends, under "Local Community Mobility Services," we include an extensive discussion of the community shuttles that are operated by the SJTA in partnership with the CCCTMA. These shuttles are also depicted in Figure 20 "Public Transit Network." We also include an extensive discussion of the shuttle services administered and operated by the counties within our region.

6. **Comment:** RECOMMENDATIONS

NJ TRANSIT suggests that in advancing transit improvements or new transit in the region, the SJTPO identify the specific requests or improvements it deems needed, define what the ridership market for the service would be, and help to substantiate the investment required to address those requests or deliver those improvements.

Credibility of ridership forecasting and estimation of capital costs should be emphasized, as should be the proper determination of whether the proposed market to be served would be sufficient to support the investment to construct and sustain new transit services.



It is our recommendation that SJTPO’s proposed RTP chapter be eliminated from the forthcoming RTP. Instead, NJ TRANSIT suggests that SJTPO explore alternative approaches for raising awareness of issues of concern in the region, including the need for planning to identify candidate projects that address defined needs, vision planning for long-term regional development, and detailed assessment of future funding needs for transportation. In lieu of eliminating the chapter, any statements, references, or suggestions of NJ TRANSIT bias or discrimination against the region, funding imbalance, or inequity in the provision of transit services, should be removed in entirety.

Response: Thank you for your comments. Due to our relatively small size and the abundant needs that exist in all areas of transportation, we cannot tackle all of our needs at once, but do hope to embark on a more detailed transit needs analysis in the not-too-distant future.

We understand your concern about Critical Issues #1 and #3, but would like to underscore the point that we included this “Critical Needs” section to highlight some major issues that have percolated throughout our region and the need to address them. They are meant to serve as a catalyst for future discussions. We also hope that in addition to the focus you have communicated about ridership forecasting and capital costs, there are further considerations for equity and the lack of mobility options in some areas, despite the SJTPO region lacking the density needed to maximize ridership and cost efficiency.

You will also note that for both Critical Issues #1 and #3, following the extensive description of the need, we include a section, “How CAN SJTPO Help?” in which we offer constructive actions that SJTPO will undertake to address these needs. For Issue #1, we write that we will work with our partners to initiate further conversations about formulas that determine the allocation of funds to our region. For Issue #3, we write specifically that we will work with NJ TRANSIT (amongst other parties) to identify specific transit issues, requests, or improvements brought by the public and engage in conversations with impacted partners to incorporate additional factors surrounding equity into service decisions.

7. **Comment:** Thank you for requesting our comments. We would be happy to meet to discuss this matter or answer any questions you may have.

Response: Thank you for your comments. We look forward to working with you and our other planning partners in confronting these challenges facing the regional transportation system.