



GUIDE TO COMMENTING ON THE

Draft DVRPC FY2025 TIP for Pennsylvania, and the Interstate Management Program for the Draft FY2025 STIP for the DVRPC Pennsylvania Subregion



Adapted from "Tips for Submitting Effective Comments," accessed from Regulations.gov on May 13th, 2024.

DVRPC wants to hear from you about its Draft FY2025 TIP for Pennsylvania. DVRPC believes that public participation is a process, not a single event. DVRPC provides multiple opportunities for a wide variety of stakeholders, including vulnerable and historically marginalized populations, public officials, and the private sector, to provide comments on and stay informed about transportation planning and programming decisions. By incorporating local information, residents' lived experiences, and subject matter expertise, plans are more implementable, beneficial, and sustainable. PennDOT, SEPTA, PART, and the five counties (Bucks, Chester, Delaware, Montgomery, and Philadelphia), the City of Chester, and other project sponsors are very interested in receiving comments from you about Draft TIP projects and/or the overall program.

A comment can express simple support or dissent for a project. However, a constructive, information-rich comment that is clearly communicated and supported with facts and local knowledge is more likely to have an impact on decision-making. The following questions and suggestions are intended to provide guidance about how to submit comments that will help sponsors deliver the best possible transportation projects.

Tips for crafting effective comments:

- Read the description and understand the project you are commenting on. Is the project a study, operational improvement, enhancing a parking lot/bus stop, or creating a multiuse trail? What are its intended effects? For example, an operational improvement project, such as signal retiming, may not be able to add another travel lane within its scope, but safety components like signage could be added to many kinds of projects.
- Be concise. Support your claims with sound reasoning, documented evidence, and/or how your community will be impacted. For example, have you observed the impacts of a new development on traffic patterns? Is there a study that supports your comment?
- Try to address trade-offs and opposing views.
- If you disagree with a project, suggest an alternative and include an explanation and/or analysis of how your alternative might meet the same objective or be more effective. A potential alternative is to not proceed with the project.
- Identify any credentials and experience that may distinguish your comment from others. If you are a resident of a community, or have relevant personal or professional experience, please state so.

- There is no minimum or maximum length for a comment to be effective.
- Is the Draft TIP document easy to use? How can DVRPC, PennDOT, PART, and SEPTA further improve their documents?

The public comment process is not a vote. One comment that is well-supported with facts and local knowledge can be more influential than a hundred comments. DVRPC and its planning partners want to fund the best projects for the region within financial constraints; when crafting a comment, it is important to explain the reasoning behind your position.

QUESTIONS TO CONSIDER:

In an effort to facilitate the public comment process, DVRPC asks the public to consider the following questions during the review of the Draft TIP document.

- Are we meeting the needs of the region?
- Is the Draft TIP following the intent of the I/JA/BIL? Such as, are we focusing on projects that address equity, sustainability, resilience, climate change, safety, and asset condition? Are we rebuilding and reinvesting in our railways and public transit infrastructure?
- Does the Draft TIP contain the appropriate mix of projects with regard to (a) the amount of investment in FHWA-funded (multimodal, including highway) projects versus the amount in FTA-funded (transit) projects, or (b) the types of improvements, such as maintenance and reconstruction of the existing system versus new capacity-adding projects; projects such as pedestrian, bicycle, smart technology, TASA funded projects, CMAQ funded projects, Carbon Reduction funded projects, or operational improvements; or freight improvements?
- Is this region getting its fair share of resources compared to other regions in the state or nation?
- Is the current transportation project development process, including environmental reviews and public input, effective?
- Given financial constraints, is this region investing money in the right types of projects?

Of course, comments are not limited to these broader issues of concern. DVRPC welcomes opinions on specific projects contained in the TIP, the TIP development process, or any other topic of concern. However, we remind those intending to recommend new projects that they must first progress through the screening and planning processes described earlier. As a result, requests for new projects are generally referred to the appropriate agency for further investigation through their respective “pre-TIP” study efforts. These study efforts may lead to the project being funded on the TIP in some future year. Additionally, a constructive, information-rich comment that is clearly communicated and supported with facts and local knowledge is more likely to have an impact on decision making.

During the public comment period, DVRPC will review each public comment submitted via the online commenting feature of the Draft TIP web map, email, and US mail. DVRPC staff will forward written comments received to the sponsor and request a response from the appropriate agency. Written comments received during the public comment period and responses to those comments will be provided in the final printed TIP document as part of the public record.

- Comments and responses will be presented to stakeholders and the DVRPC Board prior to adopting the final recommended program of priority transportation projects for the region's Pennsylvania counties. DVRPC staff plans to do this at the regularly scheduled Board meeting on Thursday, July 25, 2024.
- **Comments will be accepted for the Draft FY2025 TIP for PA and Interstate Management Program for the Draft FY2025 STIP for the DVRPC Pennsylvania Subregion from May 23, 2024 until 5:00 PM on June 24, 2024 local time.**