

D/KC MPO Innovation 2045 MTP Comment Sheet (as of 7 December 2020)

Comment	Chapter	Page	Comment	Commenter Agency	Name (Optional)	Comment date	Response date	D/KC MPO Staff Response
1	1	all	The width/size of the columns on the pages are different than Chapter I	Member of the public	Joe Concern	5/15/20	5/25/20	D/KC MPO staff have correct the formatting issue.
2	4	2	The official title is the "2020 Delaware Strategies for State Policies and Spending." It can be abbreviated as "Strategies for State Policies and Spending" or simply "State Strategies" if the full name is introduced first in a paragraph or section. This is often incorrectly written as "State Strategies for Policies and Spending," as it is at least twice on this page and throughout the chapter. Please use the correct title of the planning document. Suggest using "find and replace" function in Word	OSPC	David Edgell	8/19/20	9/21/20	Updated chapter with 2020 State Strategies information.
3	4	3	Please consider adding some text that describes the four investment levels. At the end of these comments I'm including a summary of the levels from the 2020 State Strategies document. Please feel to use this text or edit it down for your needs.	OSPC	David Edgell	8/19/20	9/21/20	Added a link in the chapter where the definitions for investment levels can be found.
4	4	4	Please replace the 2015 map with the 2020 State Strategies map. A 600dpi image of the map is attached for your use. The map source should be changed to "2020 Delaware Strategies for State Policies and Spending, page 40"	OSPC	David Edgell	8/19/20	9/21/20	Updated the map to refer to the 2020 map.
5	1	4	it refers to the "America's Transportation Infrastructure Act" of 2019 as the current transportation act. This is actually only a proposal at this time, proposed by the Senate EPW Committee and is not yet law. The House has proposed their own version of transportation reauthorization. This proposal has not passed the full Senate and there has not been a final re-authorization act passed to date by congress, to replace the FAST Act.	FHWA	Doug Atkin	8/20/20	9/21/20	This information is now included in the section describing the America's Transportation Infrastructure Act.
6	1	9	under the "Support transportation system preservation through enhanced system operations, management and sound environmental practices" goal, D/KC MPO may want to consider an objective related specifically to systems operations, i.e. Intelligent Transportation Systems that improve the operations of the system.	FHWA	Doug Atkin	8/20/20	9/21/20	Created a new Objective under goal number 3.
7	1	12	The State of Delaware already has a metric for assessing the Transportation/Land Use connection; the State Strategies for Policies and Spending. I suggest something like "95% of new or improved roadways (by mile) in State Strategies Level 1-3 that include sidewalks and/or bicycle infrastructure". The 4th PM statement in the chapter related to access to transit. Maybe something like "50% of new homes built during the period are within a half mile of a transit route" This makes DTC think about routing opportunities as well as directs staff to discuss the idea with developers at PLUS meetings.	MPO	Jim Galvin	9/4/20	9/21/20	Updated goal number 2 by deleting several objectives and adding two proposed objectives.

8	4	There is a Complete Communities law in state code (Title 2, Chapter 21)? That (relatively new) law is a potentially powerful tool that is available to communities to partner with state government for targeted investment in multi-modal transportation but it's not mentioned in the "Foster Complete Communities" section in Chapter 4.	Bike Delaware	James Wilson	9/8/20	9/21/20	Added new text to chapter on Complete Community Enterprise District
9	4	The one element I would encourage you to develop and include is a future vision of each road within the MPO boundaries. Refer to DelDOT's Transportation Corridor Strategies.	GPI	Rob McCleary,	9/8/20	9/21/20	Added text about the 2015 DelDOT Corridor Capacity Preservation Program
10		Thank you for all the hard work from the Dover/Kent MPO. Hopefully, the council will adopt this in January. Project - please relook at traffic on SR1 between Milford and North Dover. It's backed up SB on Friday and NB on Sunday. Please be sure it's at no more than an 8th grade level, as is the Delaware State News	PAC	Dr. Cohee	10/8/20	11/2/20	Thank you for the observation. The MPO will bring this to the attention of DelDOT and work with them to identify a solution. Please feel free to use the Grade Separated Intersections to access alternative routes if impeded. Regarding the reading level, we attempted to keep much of the "technical speak" to a minimum but unfortunately, a long range transportation planning document is difficult to write without some regulatory explanation.
11	6	MTP-2021-50: This project seems to be miss-marked as "Route 8 Bike Lanes", when it should be marked "Senator Bikeway Improvements". There are no bike lanes in the recommendation.	PAC	Chris Assay	10/15/20	11/2/20	You are correct in that the 2015 Dover Bike Plan on page 34 recommends implementing a east-west bike corridor (also known as the Senator Bikeway). Page 35 through 51 in the 2015 Dover Bike Plan, there are many separate projects which collectively, make up the Senator Bikeway. We will change the name to Senator Bikeway Improvements . Projects in the MTP were derived from several sources; such as Comprehensive Plans, the Regional Bike/Ped Plan, and past Plans. The territory and action may overlap but they are distinct projects.
12	6	MTP-2012-43: The Bank Lane project as a shared-use path should be removed. It was rejected by the Dover Bicycle and Pedestrian Subcommittee as unneeded and too expensive. Perhaps it could be retained as a signage and pavement paint project.	PAC	Chris Assay	10/15/20	11/2/20	The Bank Lane study was performed by professional engineers and planners that identified the improvements they thought were prudent for the corridor. They believe the improvements suggested are warranted. The D/KC MPO has several partners who request a variety of transportation projects. Those partners are listed in the MTP Project spreadsheets under "Proponent". Your recommendation that this project as a shared-use path be removed, will be forwarded to the proponent (City of Dover) of this project who can provide direction to the MPO.
13	6	MTP-2021-44 through 51 (8 projects): These 8 projects all have the same funding amounts. This seems to be a mistake, because some are only calls for painting bike lanes while others involve significant construction and therefore much higher costs.	PAC	Chris Assay	10/15/20	11/2/20	We agree these are all different projects and will actually cost more or less. The amounts used are placeholders that represents the scale of costs for the projects. Please refer to Chapter VI in the Innovations 2045 MTP under section "Innovation 2045 MTP Project Cost estimates" which might help explain the cost shown on the spreadsheet. These are very rough estimates and more accurate cost and engineering estimates will be determined when/if the project (s) are selected for a specific year.

14	6	<p>MTP-2021-36 through 38 (3 projects): These projects should be attributed to the 2011 Regional Bike Plan, as they are attributed to that plan in the 2015 Dover Bike Plan.</p> <p>MTP-2021-36 "Camden to Dover Trail" appears on Page 73 of the 2011 Regional Bike Plan.</p> <p>MTP-2021-37 "DAFB Trail" should not be also labeled "(St Jones Greenway)" because it is a different project than the St. Jones Greenway Trail Project and located east of SR 1. See Page 74 of 2011 Plan. The actual St. Jones Greenway project begins south of Gateway South shopping center on the west side of the St. Jones River. See page 35 of the 2017 Regional Bike Plan</p> <p>MTP-2021-38 "Dover Greenway" was completed years ago (Capital City Trail), although it didn't follow exactly the route in the 2011 Regional Plan on Page 72, so it should be removed from the MTP.</p>	PAC	Chris Assay	10/15/20	11/2/20	<p>The MPO only had room for one attribution in the project list and that happened to be the most recent document or plan we found that project name. Conversely, the same project idea may have been referred to as another project name in a different plan. We maintained the original name. However, you have identified one of the challenges discovered during our data gathering and that is the use of multiple names for the same project. The only way to identify where a particular project came from was to ask someone who had been around for many years. The Innovation 2045 MTP attempts to list the most recent document or plan and page number where that project can be found; the proponent of that project; and more importantly, provides specific D/KC MPO Map number that will remain with the project until such time the project has been completed. While we continue to engage our MPO partners for more accurate project information in hopes to identify redundant projects, we do appreciate our public partners providing their historical insights regarding the listed MTP projects.</p> <p>We agree the Dover Greenway project was completed and should be removed from the list.</p>
15	6	<p>MTP-2021-40 "Route 8 (Forrest Ave)": This project (MTP-2021-40) should be renamed "Senator Bikeway" as the recommendation in the 2015 Dover Bike Plan, on Page 34 refers to the entire route of the Senator Bikeway from DHS to east of US 13. Note that the project is already partly completed, but has at least 3 phases to go. Also, the cost for the remaining phases will be much higher than what is listed.</p>	PAC	Chris Assay	10/15/20	11/2/20	<p>Projects in the MTP were derived from several sources; such as Comprehensive Plans, the Regional Bike/Ped Plan, and past Plans. The territory and action may overlap but they are distinct projects. Specific to your comment, page 34 in the 2015 Dover Bike labels the project "Route 8 (Forrest Avenue/Division Street) and then page 35 in the 2015 Dover Bike Plan labels the same project "The Senator Bikeway" and then describes Route 8 (known as Forrest Avenue and Division Street) provides the primary east-west access in the City, connecting the western portion of Kent County with U. S. 13".</p>
16	6	<p>MTP-2021-41 "Saulsbury Road Shared-use Path": Project MTP-2021-41 has already been completed on the east side of the road. The west side may be done with the SR 8 & SR 15 intersection upgrade. (Not sure)</p>	PAC	Chris Assay	10/15/20	11/2/20	<p>Noted. The Westside of Saulsbury Road has not been completed yet and so should remain in the MTP Project list.</p>
17	6	<p>MTP-2021-53 "Route 8 Sidewalks": This project should be renamed "Senator Bikeway, Phase 2". DelDOT and the City of Dover have agreed that instead of sidewalks being built on the south side of SR 8 from Mifflin Road to Dover High School, a multi-use path should be built as the Second Phase of the Senator Bikeway Project. Currently, no funding has been allocated for this project.</p>	PAC	Chris Assay	10/15/20	11/2/20	<p>See the explanation for comment #14. Also, in this particular case, the project appears in the 2017 D/KC MPO MTP Update on page 49. Your comment will be forwarded to the City of Dover and DelDOT for their consideration and direction as to the naming of project MTP-2021-41.</p>
18	6	<p>MTP-2021-32 "Route 8/Saulsbury Road (DelDOT)": This listing makes no sense. The title seems to indicate that it is the huge intersection re-do project, but the page reference is for the same project as MTP-2021-41, which is listed twice in the 2015 Dover Bike Plan, on Pages 34 and 60 (as are several projects). And the cost budget is also almost exactly the same between Projects 32 and 41, so if they are duplicates, eliminate one. If MTP-2021-32 actually IS the huge intersection project, then the budget is way too low. Please solve this puzzle.</p>	PAC	Chris Assay	10/15/20	11/2/20	<p>There are 171 projects listed and despite sending the project list out to our MPO Partners multiple times, this might be one of those duplicative projects. Nonetheless, we will pass on to the City of Dover and DelDOT for their clarification and possible request to remove the project altogether for the MTP project list.</p>

19	6		MTP-2021-47 "Mifflin Road" MTP-2021-52 "Mifflin Road Sidewalks" MTP-2021-54 & 55 "US 13 Sidewalks (Dover)": Why aren't these two Mifflin Road projects combined? It would be wasteful to have them done separately. And either combine projects 54 and 55, or indicate in the chart how they are different.	PAC	Chris Assay	10/15/20	11/2/20	Yes, it appears MTP-2021-47 is a duplicate and will be removed from the list. MTP-2021-52 is found on the 2017 D/KC MPO MTP Update on page 49 as project #12 from Hazletville Road to Route 8. Regarding your second set of potential duplicative projects; project MTP-2021-54 is found in the 2017 MPO MTP Update on page 49 as project #1 (from Townsend Boulevard to Leipsic Road) whereas project MTP-2021-55 is also found on page 49 but as project #8 (from Leipsic Road to Rustic Lane). Therefore, these two projects are separate projects and the referenced document provides the difference.
20	6		MTP-2021-11 "DE 8": It is unclear to me what this project is. How is it different than MTP-2021-32? The listed source page does not exist--there is no Page 52 in the FY20 TIP.	PAC	Chris Assay	10/15/20	11/2/20	The "DE8" is a reference to the Study that recommended the project used in prior MTP's, just as "DE10" was in the first 2 projects in the list. A description can be found in the "Delaware 8 Concept Plan..." page 6-4 and 5. You are correct to point out no page 52 in the FY20 TIP and the correct page number should be A-7 . We will correct the page number in the MTP Project list. Thanks.
<p>General response to the following 31 comments which were presented to the D/KC MPO dated the same date as the Joint PAC/TAC meeting on December 3, 2020 which was the meeting to consider approving the Innovation 2045 MTP. Thank you for the observations. This information might have been helpful while the MPO provided this chapter for public and MPO partner review and comment from June through August 2020; during the virtual MTP workshop from September 8-12th; and during the required 30 day public comment period from September 24th - October 24th. Additionally, the final draft MTP was presented to the PAC on October 8th, the TAC on October 13th, and MPO Council on November 12, 2020 where these comments might have been offered. Nonetheless, the D/KC MPO reviewed all 31 comments and incorporated those DTC comments which were based on submitted Federal or State regulation references, corrected spelling errors, or changes to data which included references where the correct data could be found. Subjective observations or comments were noted but not changed into the final MTP.</p>								
21	1	12	On pp. 12 – The MPO should consider a stronger target regarding nonmotorized road user injuries and fatalities. This number is a small percentage of all roadway injuries and fatalities, but among the easiest to address through the construction of safe facilities for pedestrians and bicyclists. All DTC customers are pedestrians at some point in their travel, and we believe the MPO can push DelDOT and the state in a positive direction in this area.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for the observation and comment. It is in the best interests of all transportation related organizations to work together for a safer Kent County transportation system. As an example, the D/KC MPO adopted DelDOT's State safety performance measures in 2018. However, we may adopt our own safety performance measures in the future and when we propose this action item, all our MPO partners will have the opportunity to provide comment and input at that time. No change.
22	1	13	Pp. 13 – This goal may currently be two combined goals. We would encourage 100% of roads in State Strategies levels 1-3 to have sidewalk facilities and bicycle infrastructure. The State Strategies levels change based on municipal and county land use decisions, and Level 4 areas can quickly become Level 2 or 3 with a comprehensive plan and State Strategies update. 100% Sidewalks in Level 1-3 is not too much to ask.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for the observation and comment. The D/KC MPO staff solicited comments from the public (to include MPO Partners) on our draft MTP Goals, Objectives, and Performance measures in May 2020. You can find this information in the video vault and under presentations on the innovation page. Here's a direct link: https://youtu.be/b92yRWLf28 . No change.

23	2	13	Pp. 13 – Consider the type of housing built. For example, single family homes on ½ acre lots are hard to serve with transit – it is expected perhaps 50% of these homes will be well served. However, in the case of attached homes, apartments, and other dense forms of housing, 100% of these homes should be within ½ mile of transit. This is even more true for housing constructed using mechanisms like Low Income Housing Tax Credits and Community Development Block Grant funds. Transportation is often the #1 household cost for families in Delaware; even if afforded affordable shelter, transportation costs can result in financial strain if public transportation options are not available.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for the observation and comment. This comment might be better articulated to our Municipal and Kent County Levy Court partners as the D/KC MPO has no land use jurisdiction or authority. However, as written in Chapter 4, the D/KC MPO leverages local comprehensive planning initiatives that can address a variety of Land Use related topics such as housing type, zoning, density, etc... No change.
24	2	18	Pp. 18 – there are currently 11 fixed-route weekday transit buses (including bus 210, which serves Milford and is listed at dartfirststate.com under “Sussex County,” and six provide service on Saturday. This does not include intercounty buses, of which one was added since writing (the 307 between Dover and Lewes). Of the intercounty buses, the 301 Wilmington-Dover intercounty bus operates on Saturday; additional Saturday trips are being added in February 2021.	DTC	Nate Attard	11/3/20	12/7/20	Changed 13 to 11 fixed-route buses and five to six weekend buses.
25	2	19	Pp. 19 – as opposed to the narrative that Kent County residents “choose” to drive, we would argue that employees in Kent County have no choice as to using cars. Transit is best supported by denser, walkable land uses with robust pedestrian facilities. DTC has stretched its limited resources across the County the best it can to support those who need our service the most. However, continued land use practices that favor development only accessible by automobile will hamper transit, and by extension affordable housing, employment, job creation, food access, and the overall regional economy. For a reference to this, consider DTC’s Coordinated Plan, “Mobility in Motion” and its survey results, which reinforce that land use and overall lack of density, infrastructure, connectivity and robust pedestrian facilities hamper transit use. “Mobility in Motion” can be found at https://ridesharedelaware.org/wp-content/uploads/Coordinated-Plan-072220.pdf	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. Thank you for your referenced Mobility in Motion which appears to be dated July 2020 which was after Chapter 2 was developed and posted for initial review and comment from the public and D/KC MPO Partners in June 2020. Nonetheless, this is a good reference to include in the MTP when future amendments and updates to the Innovation 2045 MTP are considered. No change.
26	2	19	Pp. 19 – you can add the Route 106 to the list of bus routes eliminated	DTC	Nate Attard	11/3/20	12/7/20	Thank you. We have now included Route 106.
27	2	20	Pp. 20 – DART is proud to help support cleaner air; consider modifying the language that says you wish to “mitigate the standards” in favor of a simpler plain language statement about reducing single occupancy vehicle commuting.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.

28	3		<p>Pp. 26 (Money Game): We would like to note that MPO public outreach found that public transit (14%) and passenger rail (12%) are among the most supported items by the public in Kent County. Other areas we consider regularly at DTC, such as crosswalks (6%), sidewalks (10%), bike paths (7%) and air quality (9%) total 53% of the game's responses. Beyond that, fixing roads (18%) and bridges (10%) are vital for safe bus operations as we operate some of the largest vehicles on the road in Delaware. New roads only totaled 5% of community responses. However, much of the document is dedicated to new roads, when it appears local preference is fix-it-first, bike/ped, and transit. Given the amount of funds available for assignment (only about 50% of funds available were assigned to projects), comprehensive evaluations of locations where shared use paths, sidewalks, and crosswalks were needed could have filled the fiscally constrained list with projects. DTC does not currently maintain such a list but is working on such an effort and will happily provide it to you for the next MTP amendment or update.</p>	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
29	4	4	<p>Pp. 4 (Strategies). We would suggest mentioning Delaware Commute Solutions/Rideshare Delaware in your section on incentivizing mode switch, located under economic development. The MPO annually concurs on the expenditure of CMAQ funds used for this program.</p>	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your suggestion. However, D/KC MPO staff believe the following sentence captures commute and ridesharing options: "The second part of this strategy encourages employers to incentivize best transportation practices such as increased ride-sharing efforts (carpooling and van-pooling), and increased multi-modal use (transit, bike, or walking)." No change.
30			<p>Pp. 4 (Strategies) We appreciate the mention of the "Complete Communities Enterprise District" program. We are excited the MPO is interested in promoting this and hope that this will move this effort toward successful implementation.</p>	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
31			<p>Pp. 8 (Strategies). We concur that a planning effort for transit in Kent County could be a useful exercise. The Coordinated Plan cited was updated into a Statewide plan titled "Mobility in Motion" which you cite elsewhere in this plan and was published in July 2020. Nonetheless, we believe a plan to bring to light the necessary built environment features that promote successful transit (Sidewalks, Crosswalks, transit-oriented land use, transit signal priority) in Kent County will be of benefit and we look forward to working with you on this.</p>	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.

32			Pp. 7-8 (Strategies). All pedestrian studies are of benefit to transit customers and therefore are automatically multimodal. In addition to all the benefits of pedestrian studies mentioned in the section labeled "Pedestrian," a more robust pedestrian network allows DTC to better serve communities with transit. Any sidewalks built should have a minimum width of five feet to allow for placement of transit amenities. This is currently DeIDOT's standard, as specified in the Development Coordination Manual.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
33			Pp. 6 (Financial Plan). As cited above in our comment on pp. 26, we believe there is much room in this plan for addition of very necessary pedestrian infrastructure projects, which can take place by amendment or at the next update. Robust pedestrian projects – safe sidewalks and road crossing facilities at a regular interval – are sorely lacking in many places DTC serves with public transportation in Dover and Kent County. This limits our ability to serve people effectively and is an opportunity cost for Kent County households who are not able to benefit from high quality transit due to pedestrian network inaccessibility. We look forward to working with the MPO to identify additional projects that will support transit in the years to come.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
34			Project List: DTC acknowledges the projects you listed under transit, which are currently listed in the DK MPO TIP. These are not exclusive of transit projects in Kent County over the planning horizon. Historically, these types of projects (bus purchases, preventative maintenance) are not listed in MTPs. We don't think there is anything wrong with listing them here, but these projects are also recurring based on FTA formula funds, so if the MPO is asked why there are no transit projects in the mid-term or long term, you can provide this comment as a response.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. D/KC MPO staff is not aware of any prohibition of listing or considering transit projects for inclusion in CTP funding. Transit projects, like the other 7 element (categories) transportation projects, undergo a Decision Lens project priority analysis and if warranted, the project is then forwarded to DeIDOT for their statewide project priority process for CTP funding. No change.
35			Project List: We appreciate the comprehensive inclusion of projects from all of the MPO's bike and pedestrian plans. If implemented, these projects will allow DTC customers better accessibility to the bus system.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
36	General		Consider a "Landscape" Format for the plan so that images like those on pages 1 and 2 (especially those created for presentation in PowerPoint) can be more easily read.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. As the entire MTP was written in-house by D/KC MPO staff, the format was approved by our PAC, TAC, and Council. No change.
37			Consider a uniform page numbering scheme. Currently numbers are both by chapter and by document.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. As the entire MTP was written in-house by D/KC MPO staff, the page numbering was approved by our PAC, TAC, and Council. No change.

38			Pp. 2: The Delaware Transit Corporation does business as DART First State. The Delaware Authority for Regional Transit was one of DTC's predecessor organizations, merged into DTC in 1995. Mentions of DART as a separate organization from DTC can be eliminated.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your comment. The D/KC MPO changed that sentence in Chapter 1 to read, "...the Delaware Transit Corporation (DTC) (also referred to by their business entity known as the Delaware Authority for Regional Transit (DART))..."
39			On pp. 3, first paragraph, sentence beginning with "These projects are evaluated and ranked in each of Delaware's three MPOs' MTPs" through the end of this paragraph. Though the TIP has "Statewide Projects," the MTP focuses on the MPO's project area. This section is not necessary and is further compounded by the fact that each of Delaware's MPOs calls its "Long Range Transportation Plan" something different	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
40			The second-to-last paragraph on pp. 3 (In Summary) can be removed. Percent of funding varies annually, and the definition of areas subject to Metropolitan Planning Organizations is confusing and in its current form inaccurate (should be urbanized areas of 50,000 or more – many US Counties, for example, have populations over 50,000 but no MPO).	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
41			The statement "the D/KC MPO's main objective is to collect and share information on transportation projects within Kent County Delaware and provide a venue for Federal, State, and local MPO partners to consider these projects relative to fiscal, environmental, economic, and social perspectives" should be reconsidered. Based on 23 U.S. Code §134, the MPO should be convening, carrying out, or perhaps even leading, the transportation planning process in Kent County, Delaware	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. The D/KC MPO staff believe the State of Delaware is unique in that over 90% of the Delaware roads are owned by the State and maintained by DeIDOT. As such, the D/KC MPO partners with DeIDOT and our local municipal and Kent County partners regarding the transportation planning process in Kent County, Delaware. No change.
42			Pp. 3 the title "Federal Metropolitan Transportation Planning" is misleading. The section should be titled "Federal Transportation Authorizations and Relevant Agencies." All the authorizations and agencies do more than metropolitan planning. The section describing "laws, regulations, and policies" should be reframed around authorizations (which result in these three items) if you plan to just discuss authorizations.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. The D/KC MPO staff was not trying to be "misleading" when the section title was drafted. A summary of these Federal legislative Acts provides the reader with a quick summary of the Federal Transportation Acts passed from the time the D/KC MPO was established in 1992 to the current year. No change.
43			Pp. 6, second paragraph "State Transportation Long Range Plans, primarily when States utilize Federal funds for many of their road and transit transportation projects" consider rephrasing to "State Transportation Planning Process" and ending paragraph. DeIDOT/DTC is often subject to federal requirements even if not using federal funds as they are a recipient of them.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.

44			Pp. 7 "DeIDOT's additional planning documents include Rail, Freight, and Highway Safety Plans" is not necessary. There are many other plans (Bicycle, Aviation System, Transit Asset Management) so advice is against trying to provide an exhaustive list of DeIDOT Plans here.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. We believe it is necessary as follows: "Innovation 2045 aligns our goals and objectives to better support DeIDOT's goals and objectives regarding transportation planning in Kent County, Delaware." No change.
45			Pp. 8 consider using links or footnotes to indicate which "goals" were reviewed and from which documents.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your suggestion. We believe our March 26, 2020 video on MTP goal development (found at https://youtu.be/b92yRWLff28) provides the sources of the Federal, State, Regional and Local goals depicted in the image.
46			Pp. 9 first table, "Local Transportation Goals" and second table should be reviewed for comprehension.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
47			Pp. 9 – is it necessary to list a congestion goal in the third goal under "Safely Move People"? Roads with higher LOS can be less safe; intersections with lower LOS may move people slower and reduce accident severity.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. No change.
48			Pp. 10 under performance measures "MAP-21 directed MPOs to develop LRTPs" appears to not be required and should be deleted. LRTPs were required of MPOs before MAP-21.	DTC	Nate Attard	11/3/20	12/7/20	Thank you, the D/KC MPO Staff deleted that sentence.
49			pp. 13 – in discussing lane miles of road in Kent County, include the functional classification of the road type which has 289 miles. There are significantly more lane miles of road in Kent County.	DTC	Nate Attard	11/3/20	12/7/20	Thank you, the D/KC MPO Staff acquired this figure on page II-33 in DeIDOT's 2019 Long Range Transportation plan. However, we will clarify the sentence as follows: Kent County Delaware has 289 Lane miles of Roads (as depicted in the current NHS Pavement Condition chart in the DeIDOT LRTP, page II-33)
50			pp. 20 - Switch from "Federal and State" to "state and local" bicycle planning programs. There are federally supported state programs, but the Federal government does not take an active role in bicycle planning. Federally funded programs in Delaware are managed by DeIDOT and are often supported with local funds.	DTC	Nate Attard	11/3/20	12/7/20	Thank you for your observation and comment. This response is for comments 50 and 51. The sentence in chapter 2 of our MTP is as follows: "The D/KC MPO has actively supported Federal and State level bicycle and pedestrian planning efforts, especially those efforts from DeIDOT." The D/KC MPO is talking about planning efforts , not active planning activities in Kent County, Delaware. In this MTP chapter authors opinion, the word efforts , begins at the Federal level through the approval of our MTP, TIP, and UPWP which propose bike and pedestrian projects and studies. Another example might be

51		pp. 22 – Similar to last comment, though there is federal funding for bicycle programs, planning and construction takes place at the state level, as well as the local level (Delaware’s municipalities construct and reconstruct most of their sidewalks on municipal streets, for example).	DTC	Nate Attard	11/3/20	12/7/20	found in comment #29 referencing CMAQ funding. In that example, the D/KC MPO is required to review and approve State generated CMAQ funding for projects in Kent County which are funded by the Federal Government (https://www.transportation.gov/sustainability/climate/federal-programs-directory-congestion-mitigation-and-air-quality-cmaq). So, in that example, CMAQ efforts at the local level can only occur through funding at the Federal level. Regarding other Federal efforts (via funding, regulations, guidance, etc...), please take a look at this short video: https://www.youtube.com/watch?v=KfjdS-PJ278 and other references found at https://safety.fhwa.dot.gov/ped_bike/ and https://www.transportation.gov/mission/health/use-federal-funds-bicycle-pedestrian-efforts which are example as to why "Federal" is included in that MTP sentence. No change.