

Written Comments Received During the Public Comment Period on Plan 2050, the FY 2022-2025 Transportation Improvement Program, FY 2022-2031 State Transportation Improvement Program, and Air Quality Conformity Determination

July 6, 2021 - August 4, 2021

From:	Aaron R. Deutsch
То:	<u>Plan2050</u>
Subject:	Plan 2050 Comments
Date:	Monday, July 12, 2021 4:30:52 PM

First, thanks for including all of the thoughtful research and public input into the Plan 2050 draft. I skimmed it this weekend and was encouraged by what I read.

I think my only point of feedback is that every time we repave a major artery like Paramus Road in Paramus NJ without consideration for bike lanes or full shoulders, that we have to live with this mistake for decades, if not a generation.

We MUST consider bike/ped use for EVERY project we undertake and we MUST seek to break down the barriers that we've created such as highway 95 near Overpeck Park. We have these wonderful resources that are almost completely inaccessible by any means other than car and this is unacceptable for a state that calls itself "The Garden State".

We have a lot of work to do but we can improve transportation for everyone with commitment, guidance, and a bit of *insistence* from the state.

Best,

--

Aaron R. Deutsch 248 Bogert Ave Ridgewood, NJ 07450 Hi --

I read the current report and have a few comments and areas that I think should be addressed. Please apologize for any ignorance on my part as I just moved to NJ and am learning about all the bike/walk initiatives, policies and ideas. I dont know if my suggestions are redundant or impossible for that matter. Here they are:

1. Urge towns to remove inadequate, antiquated ordinances that may discourage bike use. I refer to the incident of last year in Perth Amboy where teen cyclists were stopped and arrested because they didn't have license tags for their bikes. This becomes important for the equity work regarding cycling/walking in communities of color.

2. I read about public campaigns to cyclists, pedestrians and drivers. However, I feel there should be more outreach to drivers to share the road. There are cyclists who ride more in the streets without bike lanes if motorists were a little bit more respectful and mindful of cyclists. Specific communications should be targeted at certain junctures of interaction with NJ DMV: new drivers, renewing license, etc.

3. I read about scooters. But, didn't see anything about promoting bikeshare programs. Bike Sharing is instrumental in the Bike/Walk movement especially in situations like bridging that last/first mile to transportation hubs, etc. Many transportation apps will include possible bike sharing networks to align with travel options in instances where there is one.

That's all for now - thanks for giving me this opportunity.

Kweli Campbell

Hello,

My name is Andrew Herrera and I'm a city planning grad student at Rutgers. I'm very concerned about climate change and I wanted to comment that I think NJTPA needs to see how it can support transit-oriented development. Getting people to drive less will reduce carbon emissions and make it easier to replace existing gas-fueled cars with electric vehicles. People won't drive less unless they live in places where it is efficient or desirable to do so. I think people who drive less would want to be able to walk and bike more often but also have access to public transit so they can more easily take trips to places like New York.

I think the NTJPA should support TOD by improving the transportation infrastructure in New Jersey's Transit Villages. These places are usually already dense, so it might be easier to add active transportation elements like expanded sidewalks or bike lanes. The Transit Villages should maybe get some priority for project funding, though of course infrastructure in other places needs support too.

If there is anyway for the NJTPA to aid NJ Transit in building infrastructure for electric buses and clean-powered electric trains, that would be good as well. Private vehicles are the biggest source of carbon emissions in New Jersey, and so long as lots of people are driving, more land will get cleared for roads and parking, and political support for public transit funding will be limited. They're not perfect, but I think getting people to live in transit villages or transit-rich areas will help the state get people to drive less, maybe own fewer or no cars, and take alternative forms of transportation that are less polluting.

Thank you!

Complete George

Comments on NJTPA Plan 2050 [Draft]

Proposal to Expand Recreational Cycling and Local Tourism, 7/27/21

A Rutgers study found that active transportation added \$497 million to NJ's economy in 2011.¹ And this is with little contribution from out-of-state guests. Over the past decade, New York City grew its bike grid to 1200 miles, bike share trips to 17 million and its constituency of active cyclists to 800,000.²

However, NYC has no recreational facilities not crowded with pedestrians and runners. And since most NYC residents are car-less, they are a huge potential market for recreational cycling activities that can be accessed directly or by mass transit. North Jersey can implement a number of inexpensive measures to induce them to come over. Here are some options.



Mohonk Preserve. Image Dave Krause, ADK Sports.

#1 - Permit cycling in South Mountain Reservation

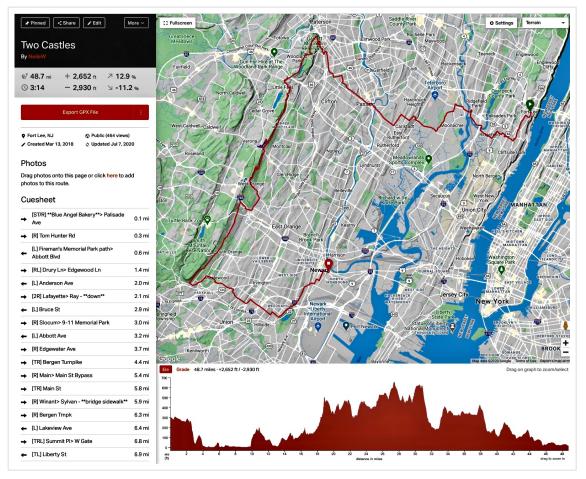
The Mohonk Preserve comprises 8000 acres in Ulster County, NY. It annually hosts 250,000 visitors paying \$20 per day which sustains an \$8 million budget.^{3 4 5 6} Notably, the Preserve includes 80 miles of "carriage roads" which are promoted for bicycling. Unfortunately, the Preserve is a two hour drive from NYC and not accessible via public transportation.

South Mountain Reservation comprises 2100 acres and has its network of carriage roads laid out by Fredrick Law Olmstead. Conveniently, the SMR is just 45 minutes from Penn Station via NJ Transit. However the SMR does not permit cycling. This deprives the SMR of potential use fees and local vendors of customers.

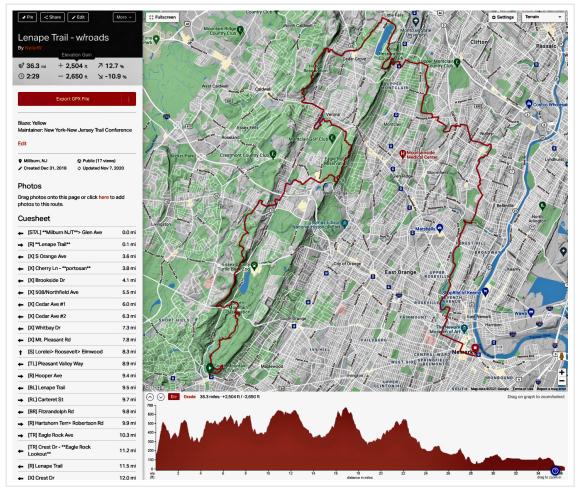
#2 – Designate "Numbered" Routes

"Numbered" routes would be modeled on the U.S. Bicycle Route system.⁷ Also NJDOT's plan to connect High Point to Fort May.⁸ They would aggregate existing on-road routes, separated paths, low-intensity residential streets and industrial areas that receive little traffic on weekends.

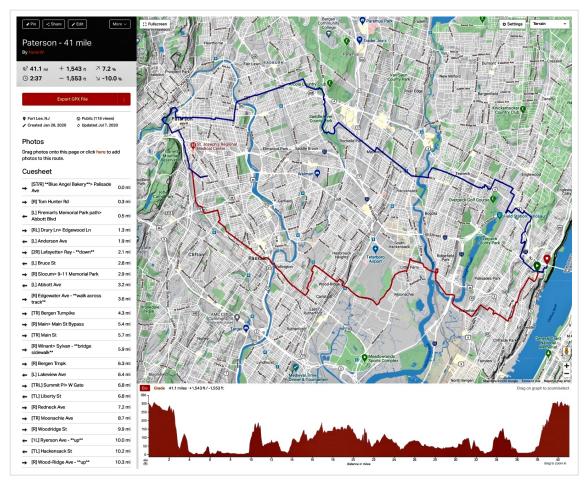
A network of numbered routes could be accomplished quickly by posting online GPS and distributing maps to bike shops. As routes gain acceptance, they can be enhanced with signage and on-street improvements. Examples of numbered routes include:



Two Castles spans four counties and is accessed via the GWB, PATH and NJ Transit.



Lenape Trail would upgrade dirt paths and on road portions to facilitate cycling.



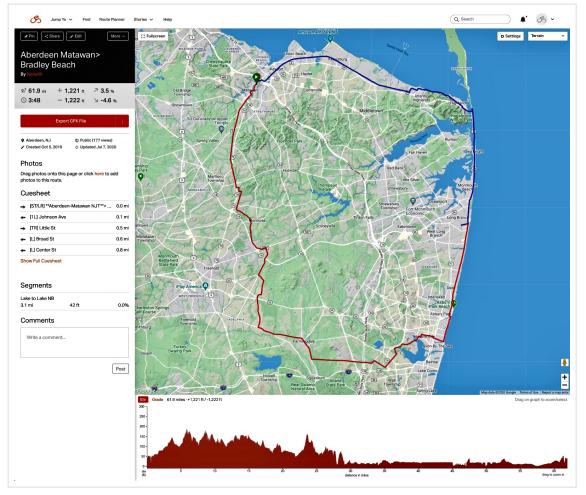
Paterson features Great Falls Park and local Peruvian/Middle Eastern food stops.

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→ [ST/R] **Blue Angel Bakery**> Palisade	e 0.1 mi
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Segments	
Bayonne Bridge - South Bound	
1.5 mi 198 ft	2.0%
Bayonne Bridge Climb - South Bound 0.8 mi 199 ft	4.4%
Comments	
Write a comment	
	Post

Black Tom connects waterfront parks and paths between Fort Lee and Lower Manhattan via George Washington and Bayonne Bridges and the Staten Island Ferry.



Newark> *Perth Amboy* routes along industrial roads (quiet on weekends) to link the Bayonne, and Goethals Bridges, and a (bikeable) Outerbridge Crossing to Middlesex Greenway and D&R Canal.



Aberdeen-Bradley Beach connects Henry Hudson Trail and Jersey Shore. Accessible via NJ Transit and SeaStreak Ferry.

#3 – Widen the bikeways across the George Washington Bridge

On June 15, 2020, the shared-use path across the Mario M. Cuomo Bridge opened. In the three weeks, there have been six reported crashes.^{9 10} Already there were calls for the facility to be shut down until it can be made safe. The Cuomo SUP is 12 foot wide and connects 1.3 million residents of Rockland and Westchester.

By comparison, the George Washington path is 7 foot wide and is the sole bikeable connector for ten million residents of North Jersey and NYC. If the GWB is deemed unsafe and all users are required to walk, that will disrupt any measures North Jersey takes to attract New York City visitors.¹¹

Note: There is a proposal to fund \$50 million to widen the GWB North Path as part of New York's \$2 billion Restore Mother Nature Bond Act.¹² As part of Plan 2050, NJTPA should consider allocating an additional \$50 million dollars to widen the South.

Neile Weissman, 2021



Mario M. Cuomo Bridge – Mark Lenniham, AP

Notes

¹ "The Economic Impacts of Active Transportation in New Jersey," USDOT-FHWA-Rutgers University, 2013, http://tinyurl.com/oednylm

² "Cycling in the City, Cycling Trends in NYC," NYCDOT/NACTO, 5/19/20, https://tinyurl.com/hcu5yaz

³ Mohonk Preserve, https://tinyurl.com/jd8tudt

⁴ "Mohonk Preserve 501c3 profile," Guidestar, https://tinyurl.com/yczowgjn

⁵ "Mohonk Preserve 2018 IRS Form 990," ProPublica, https://tinyurl.com/yaqwmbvc

⁶ "Bicycling," Mohonk Preserve, https://tinyurl.com/ycu7on6a

⁷ "U.S. Bicycle Route System", Wikipedia, https://tinyurl.com/v423ddc

⁸ "High Point-to-Cape May route, a tour guide for cyclists", New Jersey Department of Transportation/RBA Group/NV5, https://tinyurl.com/udp9wgh

⁹ "How Safe Are Gov. Mario M. Cuomo Bridge Paths?" CBS New York, 7/7/20, https://tinyurl.com/y7u4ysbv ¹⁰ "There have been six accidents requiring emergency response," "Safety concerns emerge with new bike, pedestrian path on Mario Cuomo Bridge," ABC7NY, 2/2/20, https://tinyurl.com/y9dewf9k

¹¹ "Safety, Litigation and the Demise of Cycling Across the George Washington Bridge," Complete George, 9/17," https://tinyurl.com/5mxz7sjy

¹² "North Path Plan," Complete George, https://tinyurl.com/f6f7jdm

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To: North Jersey Transportation Planning Authority (NJTPA)

From: New Jersey Bike & Walk Coalition (NJBWC)

RE: Draft Long Range Transportation Plan 2050 Comments

Thank you for the opportunity to comment on the Plan 2050: Transportation, People, Opportunity, the long range transportation plan (LRTP) draft. New Jersey Bike & Walk Coalition is an advocacy organization working towards a safer, more walkable and rideable New Jersey by supporting bike and pedestrian issues at the local, state and national levels. We deeply commend the time and work the North Jersey Transportation Planning Authority (NJTPA) has put into making this draft. Documents like the LRTP are crucial blueprints for the future of transportation infrastructure, a fundamental aspect of making New Jersey a more livable state.

We found this draft LRTP to be both timely and forward thinking as it takes into account the mobility changes and new trends that have emerged as a result of the COVID-19 pandemic. The growing attention to active transportation and the transformation of public spaces and streets to create active social spaces in the plan illuminates a positive path forward. New Jersey Bike & Walk Coalition would like to lend our support to this effort by providing the following comments and suggestions for the final draft. In order to get more input for your draft we also reached out to our members to comment and we have included those comments at the end.

Accessibility

First, we appreciate the NJTPA's stated commitment to ensuring infrastructure and transportation projects are accessible to all people in New Jersey. Some things to consider in the final revision of the LRTP could include the following:

- The "Guidance for Long Range Planning" on page 6 should include taking an "all ages and abilities or 8-80" approach to planning and designing the transportation system. The needs of all people should be considered including all ages, abilities, genders, races/ethnicities, income levels, and backgrounds. Traditionally our transportation system has been planned and designed by and for the average, able-bodied white male. Moving forward, all current and potential future users should be considered, reflecting the diversity that is found in New Jersey communities. Especially as the large Baby Boomer population continues to age (a trend referenced in the plan), there must be greater attention given to making streets accessible and safe for the elderly and providing alternative mobility options to driving.
- More attention should be given in the plan to the importance of providing affordable mobility, a major equity issue in the region. The lack of access to safe affordable mobility options has greater impact of those communities of color where there is a greater population of people who do not own personal cars. Strategies for safe and

accessible active transportation and connections to transit are an integral part of providing equity mobility in the region.

- Support for E-Scooter and Bike Share programs are key to increasing mobility options, especially in denser areas.
- In order to meet New Jersey's climate change goals we need to reduce our VMT and increase opportunities that encourage active transportation users. Overarching goals should include a focus on creating a mode shift in the region to increase levels of cycling and walking, with a recognition that one of the greatest benefits to this shift is that it reduces vehicle congestion and greenhouse gas emissions within densely populated and urban areas. NJTPA should set specific modal shift goals for 2050.
- MPOs are required to track measures of various aspects of transportation performance, however the performance measures are very car-centric and when geared towards bicyclists and pedestrians tend to be focused solely on safety. While the goal of reducing deaths and serious injuries should be a top priority, our road infrastructure should be inviting for all road users and provide an enjoyable and convenient way of getting around. How can we further develop these performance measures to focus on the "quality of service" (accessibility, convenience, comfort, AND safety) and the movement of people, not just vehicles, through the region? NJTPA might consider developing "Quality of Service Standards" that look at the quality of infrastructure, as well as travel time performance measures for active transportation.
- In the background paper, Active Transportation in the NJ TPA region, the Level of Bicycle Compatibility Analysis states that 46% of NJ roads fall into category 3: moderate traffic street, comfortable for those who already ride bicycles. This analysis seems generous. While most existing cyclists might be able to cycle on those roads, it is less likely that they would perceive them as "comfortable". Given the high numbers of serious injury and fatalities in the state NJTPA should create a more detailed analysis of the level of compatibility in order to provide a more realistic account of the current state of our roads and the implementation of complete street policies in relation to infrastructure that supports active transportation.
- A 2021 Active Transportation Plan, as described on page 64, is much needed As a basis for the plan the NJTPA should create a publicly available central inventory of existing active transportation facilities to provide an overall picture of the regional network and identify gaps, to include both the existing and the proposed additions to the network.
- The plan states that 10% or more of the region's population has commuted to NYC in recent years and mentioned the Gateway program as an important investment. The proposed Active Transportation Plan should include a strategic plan and investment in regional projects that would make it easier for people to cycle from New Jersey cities and suburbs into New York? An example would be investment in the Essex Hudson Greenway, and the Bergen Arches and 6th St. Embankment projects in Jersey City.

Road Safety

Second, we applaud the NJTPA's careful consideration of safety concerns here are some additional comments and suggestions on road safety to address in the final draft of the LRTP

- Strategies should include learning from changes seen during the pandemic and thinking differently about what and who our streets are meant for deprioritizing speed and vehicles in highly urban areas and prioritizing safety and people.
- Local municipalities often experience difficulties in knowing where to start with implementing Complete Streets in their cities/towns. The plan should include strategies that further assist local municipalities in implementation of the NJDOT Complete and Green Streets policy. Strategies could include proactive guidance through creation of a step-by-step method for identifying projects for funding in municipalities and a system to reward municipalities that use the policy as part of the identified planning process for grant applications.
- The New Jersey Safe Passing bill will become law this year. The plan should incorporate a strategy for an education/promotion campaign to increase awareness of this law through its Street Smart Program.
- NJTPA should do an analysis study of the effects of the current Street Smart Program to access its impact at improving road safety and level of implementation by municipalities.
- NJTPA should include its own target of zero serious injuries and fatalities on roadways in the region (Vision Zero), as well as provide resources to counties and municipalities adopting their own <u>vision zero policies</u>. Resources could include:
 - Analysis of existing strategies for reaching Vision Zero i.e. complete streets, traffic calming, policies that prioritize biking and walking, land use practices.
 - A toolkit that incorporates successful strategies and lessons learned from cities that have existing Vision Zero policies, task forces, and implementation plans.
 - How to get funding for projects that advance Vision Zero.
 - Strategy that rewards Vision Zero policies in funding grant applications
- NJTPA should do a and high injury network analysis and crash data for the region to address the most dangerous corridors for people walking, bicycling, and driving in the area as part of the Local Safety Program and this information should be publicly available.
- A sidewalk inventory, similar to <u>the one done by DVRPC</u>, should be done for NJTPA to address the issue of pedestrian safety, noted to be a serious problem in the Long Range Plan.

Trails

Third, NJ Bike Walk commends the LRTP draft's inclusion of trails as areas of interest in implementing safe and accessible transportation options. Specifically, the mentioning of the Essex-Hudson Greenway as a potential project to achieve these goals is much appreciated. Some additional things to include in the final draft are:

- The plan should include opportunities and strategies for developing a regional North Jersey Trail network of urban trails in North Jersey that can serve as a safe, off road active transportation network, using the Circuit Trails as a model:
 - This strategy should operate on the framework that this network would not be primarily for recreation, but equally be a transportation network that provides vital

connectivity and safe, off-road mobility for biking, walking, scooting, rolling, and skating.

- Map existing opportunities proposed projects (Essex-Hudson Greenway, Bergen Arches, 6th Street Embankment, Northern Valley Greenway), existing abandoned/unused rail lines)
- Conduct a series of case studies on trail projects and connectivity between trails in New Jersey (Morris Canal Greenway, D&R Canal Towpath, Henry Hudson Trail) to inventory successful strategies and lessons learned at all stages of trail development.
- The plan should address challenges and overcoming barriers for multijurisdictional trail projects.
- In addition to transit-oriented development, strategies should include trail-oriented development that concentrate jobs, homes, retail, services, and parking around greenway/trail heads.
- The Essex-Hudson Greenway is mentioned briefly on page 63. This project should also be mentioned in the Plan 2050 Background Paper on Active Transportation and should

Integration (Transit + Walking + Biking)

Fourth, NJ Bike Walk would recommend including the creation of an integrated and reliable transportation systems that effectively achieves the seamless operation of multiple modes of transportation as a part of LRTP priorities. Again this connectivity is of particular importance in building an equitable transportation network. Taking a holistic approach to transportation infrastructure with the combination of transit, walking, and biking should consider:

- NJTPA should consider the development of a regional plan for mobility hubs or parkand-ride facilities that would be located outside cities and offer retail, services, and parking as well as connections to transit that would shuttle travelers into urban areas.
- The 51% of funding allocated to support the transit network should be allowed to be spent on adequate bicycle parking at stations and first-last mile solutions to help people arrive and leave from stations.
- Strategies to support active transportation in the proposed Active Transportation Plan must include an emphasis on implementing a 'network level approach' to planning infrastructure. The network of active transportation infrastructure should connect important destinations in the region to facilitate transportation to schools, places of work, health care facilities and downtown centers.
- Transit systems need safe, last mile-solutions. When a bike/walk + train combination is implemented it contributes to more equitable transportation access as well as a reduction in automobile use, congestion, and air pollution.
- An important part of creating this integration is developing a regional strategic plan for bicycle parking at transit stations and other important commercial destinations in the

region. Lack of adequate bicycle parking is a significant factor in discouraging people to cycle.

Funding

Fifth, we appreciate the LRTP's careful attention to detail concerning transportation and infrastructure funding. Some comments the NJ Bike & Walk Coalition has for the final draft include:

- Strategies should include identifying new and innovative funding sources needed to implement bicycle and pedestrian projects (in addition to transit improvements)
- Making the connections of climate change, health, economic development benefits for bike/ped projects and identifying additional finding sources that link to these issue areas for active transportation projects.
- The plan discusses that 64% of or more of the budget must be devoted to maintaining and improving existing infrastructure. This maintenance should also apply to bicycle and pedestrian infrastructure, but too often we see bike lanes with faded paint, debris, and potholes and cracked sidewalks. The LRTP should dedicate a percentage of this funding to the maintenance of bike/ped infrastructure and explain how these funds will remain secure for that.

Comments from Residents Who Bike & Walk Summited to NJBWC

Lastly, as a bike/ped advocacy organization, we reached out to members of our community for additional comments and suggestions to help improve the Plan 2050 LRTP. Many of the responses we received included: road safety, specifically in shore communities; trails; and adopting a systems level approach to improve active transportation and transit infrastructure planning. More detailed suggestions and concerns are listed below:

- Road Safety
 - "I have commuted to work by bicycle off and on for 20 years. I also ride a lot for weekend exercise. The more roadway shoulders designated for bikes, the more signage to remind drivers to share the road, and the more laws protecting cyclists when drivers don't pass safely are all ways to support a safe environment for all to share our roadways. Thank you for this opportunity to share my feedback."
 - "I have been a professor of sustainability for several years, moving to NJ to work here. I must say that I have never been more terrified to ride my bike to work or walk in many places as I have in northern NJ (I have lived in OH, San Francisco, NYC, Princeton, and Philadelphia). I would greatly appreciate a safe space to do those things that is separate from drivers. As more people move to NJ from the city, it is also important to provide these kinds of transportation options, as many people do not want to drive a car in NJ. We should be encouraging these activities, not dismantling options for doing so. If we want to make any impact on climate change, we have to start with providing other

options for people besides encouraging electric cars. Not only is biking and walking good for individuals, it can help reduce air quality concerns and contributes to co2 whatsoever. Any way to get people out of cars, and into a less environmentally disruptive way of getting around should be encouraged and supported by all levels of governance, including the state and municipality level. This presents a complex issue in NJ, and state support for this project would go a long way in making it happen. I must also say that **if I were to leave NJ**, **it would be because of the hostile street environment and lack of places that are separate from cars to get around**."

- I feel it would be beneficial if there was a state contract for frequently used pedestrian safety items such as in street pedestrian safety signs, traffic barrels and cones and RRFB's. A point of contact and/or clear process to request approval for use of RRFB's on state roads would also be helpful. Lastly, make grant funding available to purchase these items.
- Being a shore community it would be great to have a safe transversable and officially labeled bike lane in Sea Bright. As you may or may not know, Sea Bright has basically one main state road (Rt 36) that runs from one end to the other. Unfortunately there is NO designated bike lane anywhere in town, and from just south of the Rumson bridge up to the Highlands bridge the shoulders are extremely narrow and dangerous for unseasoned riders. This forces bicyclists to have to either navigate sidewalks, a VERY narrow shoulder, or utilize the various beach club parking lots. This has caused issues with the beach clubs, where minor accidents have occured between cars pulling out of parking spaces and bicycles, usually traveling in the wrong direction
- Thank you to the City of Margate. They took Atlantic Ave, a busy 4 lane road and calmed the traffic down to one lane in each direction, with a center turn lane and wide bicycle lanes on both sides. I understand that Ventnor City has the same plans for the near future. Shore towns receive a massive influx of bicycle riders and pedestrians, every summer. Not wanting to jump our place in line, but, I feel that money and resources should go to the areas with already high bike/ped traffic. Support the largest industry in NJ, tourism. Thank you for listening.
- At many intersections, the paved shoulder vanishes into a right turn lane. This is where it is most needed! The turn lane is necessary, but a three-footwide space should be maintained for cyclists.
- Trails
 - If there is no backing by the State & counties for the somewhat already doomed Essex-Hudson Greenway, then I for one opt out. We need our green spaces especially when these pandemics roll down on us, and they will keep coming. A nine mile park in this congested area would rival the Hi Line in NYC. Where is the money for this bike & walk trail??
 - We have developed the Summit Park Line, a pedestrian and bike alternative transportation path along the abandoned Rahway Valley Rail line. This type of Re-purposing defunct railway into 'last mile' alternative transportation is

critical to greener transportation in the future. Please commit resources to not-for-profit organizations like ours that have the experience and tangible results to get these projects accomplished.

- Bike/Ped Accessibility/De-centering Automobiles in planning
 - As a resident of Morris County and New Jersey, I do not feel this plan represents the future needs of myself, my family, or other residents well enough, particularly when it comes to investment in pedestrian, biking, and electric vehicle infrastructure. I would like to see projects that extend pedestrian access in Morris county including sidewalk build outs - **my family cannot access important parts of town because of lack of sidewalks** - pedestrian road shutdowns in towns like Morristown, Madison, and Chatham on certain days to encourage nonautomotive access, and bike lanes throughout the county so that I and my family can safely ride bikes to get around and for recreation instead of relying on the car. Separately, while recent bills to extend EV infrastructure are a good start, I would like to see a build out of EV charging infrastructure across the state and additional incentives including more reliance on clean renewable energy to encourage the transition from fossil fuels that pollute and harm the health of our residents.
 - eliminate the tables on sidewalks -eliminate all plant/trees decor that makes it visually impossible to see pedestrians remove barricades on ocean ave people cross wherever they want to sidewalk dining leaves no room for walking-strollersdogs- sidewalks need to be cleared these tables are absolutely blocking the sidewalks!!very dangerous can not see pulling out side streets views are blocked
 - Bogota council and mayor have been receptive to my safety concerns for the 0 bike riding community here in Bogota. They asked the County to place signage on River Road and Degraw in Bogota. Those are the places where most pedestrian/Bike accidents have occurred. I applaud their efforts but we need a more coordinated approach at the County and State level. There are a dearth of bike lanes / signage in Bergen County. Most people get around by car and don't take notice of the cycling community. There are many people who want to use their bikes for recreation and transportation yet feel too scared to ride. The driving public needs to be educated about the bike riding public. As we move into a future with global warming issues coming into larger focus, we owe it to ourselves, our children and those coming after to provide transportation alternatives that do not produce green emissions and are low cost. Our children will demand it. I am advocating for a County wide program to place bike lanes and signage so the bike riding community can feel safe and grow. This community is now invisible because of fear. Fear of being hit from behind or doored. More safety means more riders and more cars off the road and less green house gases. Thanks
 - We would like the Township of Weehawken to adopt the complete streets program and begin building dedicated bike lanes.

- Need bikeways that are safely separated from cars and have rest stops, that connect places that people often commute to, such as NYC, Metropark/Edison area, etc.
- The NJBWC recommendations for improvement of the Bike and Walk conditions in New Jersey are terrific. I am an avid bicycle rider and everything that we do to encourage biking and walking by people in New Jersey improves our environment and the health of the people doing the biking and walking. I support and encourage all projects designed to improve the conditions in our state that will make it safer and easier to use our bicycles and our own two feet for walking.

Thank you again for the opportunity to provide comments for Plan 2050: Transportation, People, Opportunity, the long range transportation plan (LRTP). We hope these comments will be of value to the NJTPA as you finalize the plan and will make an impact on creating a more walkable and bikable future New Jersey!

TRI-STATE TRANSPORTATION CAMPAIGN



Tri-State Transportation Campaign Public Comments on NJTPA's 2050 Long Range Plan <u>NJTPA Long Range Plan 2050</u> Janna Chernetz, Deputy Director janna@tstc.org Sonia Szczesna, Director of Active Transportation <u>sonia@tstc.org</u> August 4, 2021

Accessibility

• The long range plan must ensure that active transportation networks exist and connect to transit hubs for first/last mile options and these options should be enhanced with e-scooter and bike share programs to increase mobility options. Trails, greenways, and other active transportation infrastructure are required to ensure these connections are safe.

Efficiency & Safety of the Road Network

• We need Bus Rapid Transit to encourage residents to leave their cars at home and to make transit more efficient than driving.

Road Safety

- NJTPA needs to adopt its own target of zero serious injuries and fatalities on roadways in the region and encourage as well as provide resources to counties and municipalities adopting their own vision zero policies. Areas in overburdened communities with high crash rates must be prioritized for investment.
- NJTPA should do a high injury network analysis for the region to address the most dangerous corridors for people walking, bicycling, and driving in the area.
 - This information should be publically available.
- Crash data for the region should be publically available, easy to understand and access to help address the needs of municipalities and counties as well as residents.
 - Make publicly available the existing list of most dangerous intersections in the region and proactively work to address those, using temporary quick builds if necessary while waiting for resources to make permanent improvements.
- A sidewalk inventory, similar to <u>the one done by DVRPC</u>, should be done for NJTPA to address the issue of pedestrian safety, noted to be a serious problem in the Long Range Plan.

TRI-STATE TRANSPORTATION CAMPAIGN



Transit & Travel Options

- Even though there are a ton of alternative travel options, the primary mode in this region is still cars and while NJTPA's plan embraces this idea of "mobility as a service" where the rider chooses based on the cost, destination, and convenience to incentivise and encourage the customer to use over-driving.
- Lower income communities rely on the buses, however the reliability of the buses is an issue due to congestion, weather, road incidents, overcrowding. NJTPA needs to prioritize communities who rely on the bus because it's their only option--no choice. NJTPA should focus on those who are transit dependent, which means making the bus more reliable for them.
- Because of the pandemic, the way we live/travel has changed. Rail ridership was most heavily impacted because of the sheer amount of riders who have adapted to a remote work model and no longer need to commute by rail to the office. However, intra city bus did not see as a significant reduction as transit dependent riders more often utilize bus. In fact, bus carries more riders than rail yet does not get as much priority. Focus must be on increasing service in transit dependent communities for 7 days a week access.
- There are substantial challenges facing all public transit agencies right now. The biggest challenge is recapturting ridership lost from the COVID stay at home orders. As we emerge from COVID, this is an opportunity to redefine the role public transit plays in the state and create a true public transit service that meets more of our resident's mobility needs. We lag behind other countries in this respect as our public transit is still focused on the Mon-Fri standard commuter.
- There is a need for greater investment in more accessible transit infrastructure such as safe walking paths to bus stops and safe bus stop designs also addresses equity issues, since the most frequent transit users are minority and low-income residents.

Air Quality

- Support the advancement of NJT meeting the statutory mandate of converting to an all EV bus fleet. Priority for roll out must be in environmental justice communities.
- As a result of the mitigation factors and stay at home orders during COVID, there was a substantial increase in goods delivery. This translates to an increase in truck traffic on neighborhood roads, ports, and highways. This threatens the safety and health of those who walk, bike, drive and live around these roads. Priority must be given to reduce the need for truck traffic, incentivize truck transport during low volume hours and electrify trucks to reduce harmful emissions.

TRI-STATE TRANSPORTATION CAMPAIGN



Walking & Biking

- Counties and municipalities within the NJTPA region should adopt <u>complete & green streets</u> <u>policies</u> that require updated infrastructure to deal with traffic safety, health implications, economic growth, equity and the environmental impacts of road design suchs as stormwater runoff.
 - Increase attention to equity considerations in evaluating transportation investments to consider communities most affected by the lack of pedestrian access, including low-income communities.
- Since the most successful trails used for transportation span across multiple jurisdictions, there needs to be leadership, convening, and resources at the metropolitan planning organization level in order for successful coordination of projects. NJTPA should put more resources into connecting trails across the region and provide support to counties and municipalities looking to do so.
- A region-wide trail network should be included in the Long Range Plan for 2050 to enhance mobility options and address the concerns noted in the draft Long Range Plan
- NJTPA should work in concert with NJDEP, NJDOT, counties and municipalities to identify opportunities to improve connection trails to create a regional network with a goal of comprehensive and continuous connections throughout the state.
- See previous comments about a regional sidewalk inventory in the road safety section.

Additional Equity Considerations

- Encourage collaboration with employment centers to improve access to jobs for those living in underserved communities who are transit dependent. Incentives business to assist transit dependent workers.
- Collaborate with NJDCA to link travel opportions with housing especially in overburdened and low income communities.

From:	Rebecca Baxt
То:	<u>Plan2050</u>
Cc:	info@nvgreenway.org; Jonathan Shammash
Subject:	Northern valley greenway
Date:	Sunday, July 25, 2021 10:13:46 AM

Please approve the northern valley greenway that would greatly improve access to nature and exercise and alternative means of transportation for thousands of local residents

Thank you

Rebecca Baxt

Dear Madams/Sirs,

As a homeowner of Closter, NJ for over 25 years, and having been brought up in New Milford, NJ and as a successful science and nature preschool instructor for 17 years, I implore the state and local governments to please move forward with plans to build the proposed Northern Valley Greenway through our ever-growing, ever so congested small towns.

- These paths would create safe bicycle transportation opportunities for those of us who would love to have the choice to bike to nearby shops, services, recreation and the like, but are too afraid of local traffic.
- As a parent of two, now grown, children, I would have liked to allow them to ride their bikes off our block but was too worried that they would be hit by a car. (My son was almost hit by a negligent driver when he was eleven ON OUR BLOCK!)
- This Greenway would offer ample educational opportunities for children as community schools and organizations could ban together to plant native species, encourage environmental stewardship, offer cultural exposure to art through outdoor exhibits and musical performances, etc.
- Lastly, it would be so nice to simply enjoy the outdoors more! Something a global pandemic has taught us all, is that we need to connect more to our natural environments!!

The unsightly CSX tracks could be turned into a beautiful, productive, enriching public space. We need your help!!!

Thank you.

Sincerely,

Maria F. Costa 82 Everett Street Closter, NJ. 07624 The Northern Valley Greenway is a proposal to convert a rail line running from the NY state line in Northvale down to Englewood into a walking/biking trail. All the towns along the line have supported it. It would be a great addition to the quality of life here in North Jersey.

There are many reasons to support it:

* It would link up to the Empire State trail system which is really coming together all across NY state.

* It would convert a rusted weedy abandoned railroad line to a beautiful park connecting the downtowns of 6 towns: Northvale, Norwood, Closter, Demarest, Tenafly, Englewood.

* I've seen a similar trail in Indianapolis, called the Monon Trail, and it has greatly expanded businesses, restaurants, downtowns, living spaces, and foot traffic

* It would be a safe place for our children to ride their bikes, for local track teams to practice, and of course for everyone to walk and bike

* It preserves the transportation corridor, preventing it from being broken up, in case we ever need another rail line (doubtful) or maybe for other commuting purposes.

The pandemic illustrated how much people value their parks. The DOT studies are done. It's feasible. Let's do this!

Sincerely,

Betsy Longendorfer

407 Grace Ave

Northvale, NJ

From:	<u>Deborah Katz</u>
То:	<u>Plan2050</u>
Subject:	Northern Valley Greenway
Date:	Sunday, July 25, 2021 9:02:27 PM

This is such an important project for our community. Having a bike/walking trail will give families a safe and welcoming place to take their kids out for exercise. The trail would also help to support local businesses. We need a safe place to enjoy nature away from automobiles. Please support Northern Valley Greenway.

I am a resident of Paramus in Bergen County and I think the Greenway is a great idea. I would love to see this happen.

Dale Muto

Sent from Yahoo Mail for iPhone

From:	<u>vivian holzer</u>
То:	<u>Plan2050</u>
Cc:	info@nvgreenway.org
Subject:	Northern Valley Greenway
Date:	Tuesday, July 27, 2021 12:28:50 PM

This rail trail would be an awesome addition to our area for safe recreation. Away from traffic such as trucks, speeding SUV's and cars, it would be a safe way for families to get out and exercise.

I often use the rail trail on our border with New York as well as some of the beautiful trails on both sides of the Hudson River.

Last summer we rode the rail trails in Cape Cod, which also help preserve nature and draw birds back to the area.

They bring business to the local areas such as bicycle rentals and repairs, food stops and even lodging. Some have become destinations.

It certainly would be more attractive than the abandoned railroad tracks and safer as a place to walk or ride a bike.

There is a growing movement across the country to make these safe cycling paths and the pandemic has increased demand for them. it is time that New Jersey join in and the NVG would be a great start for Bergen County.

Sincerely, Vivian Holzer

From:	mb.cottrell
То:	<u>Plan2050</u>
Subject:	greenway
Date:	Tuesday, July 27, 2021 3:21:58 PM

Live in the northern valley of Bergen County NJ (a very populated area near the GWB) that cannot have enough green areas for physical activity and serene space. The proposed Greenway along the defunct railroad tracks from Englewood through Northvale, NJ would be an ideal place to develop some additional usable , safe green space for our area. We support such a project 110 %. Thank you for any consideration - hopefully our very large tax dollars will help ensure something like this comes to fruition!

Thank you The Cottrell Family Hon. Kathryn A. DeFillippo Chair, North Jersey Transportation Planning Authority One Newark Center, 17th Floor Newark, NJ 07102

Re: Comments on Plan 2050

Dear Chairwoman DeFillippo,

The Borough of Demarest strongly supports the inclusion of the Northern Valley Greenway project in Plan 2050. The project proposes turning 8 miles of the unused Northern Branch Corridor into a biking and walking path. Demarest residents need safe areas to walk and bike.

The Northern Valley Greenway merits additional consideration in the Plan 2050; it is only mentioned once in the draft plan. New York State has already turned its portion of the former Northern Branch Corridor into a rail trail. The Northern Valley Greenway would link to the Joseph P. Clarke Rail Trail at the New York Border, connecting it to Piermont, Orange, Nyack, and Blauvelt via the Old Eire Path and Raymond Esposito Trail. The southern terminus of the Greenway would provide access to the Hudson-Bergen Light Rail Northern Branch Corridor Extension, enhancing the use of mass transit.

The project requires financial and technical assistance that the North Jersey Transportation Planning Authority can prioritize and provide. The project traverses six small municipalities that would otherwise lack the resources and expertise to execute such a project. The NJ Department of Transportation conducted a feasibility study that found no fatal flaws. We would like to see a roadmap for the Northern Valley Greenway included in Plan 2050 to take advantage of this unique opportunity for active transportation in Bergen County.

Sincerely,

Melinda Ianuzzi Mayor Demarest, NJ

From:	Jack Zeigher
То:	<u>Plan2050</u>
Subject:	Northern Valley Greenway Comments
Date:	Tuesday, July 27, 2021 5:06:26 PM

To Whom It May Concern,

Hi! I am Jack Zeigher, a senior at Cresskill High School, and I would like to share my thoughts regarding the plan for the Northern Valley Greenway. Throughout the pandemic, I found myself walking and biking more than ever. From Cresskill, I biked and walked to Tenafly, Englewood, Demarest and Closter, and many of my friends did the same. The implementation of this Greenway would be a safe and effective way to connect these towns. The Greenway would have an immense positive impact in Cresskill especially, given that the Greenway would replace the old railroad tracks that pass right by CMS and CHS, which would give students a safer path to walk or bike to school. Currently, the railroad tracks in Cresskill are used by students, but they are dangerous; lots of broken glass, and the path gets very dark at night.

The Greenway would do a lot for my community. Young children and adults would be able to walk and bike safely between towns in our area.

Thanks, Jack Zeigher



BOROUGH OF CLOSTER

295 Closter Dock Road, Closter, New Jersey 07624

John C. Glidden, Jr.

Mayor

Victoria Roti Amitai Scott Devlin Fax Borough Council Jannie Chung Alissa Latner

Office

201-784-0600 x 500 201-784-9727

Dolores Witko Joseph Yammarino

Hon. Kathryn A. DeFillippo Chair, North Jersey Transportation Planning Authority One Newark Center, 17th Floor Newark, NJ 07102

Re: Comments on Plan 2050

Dear Chairwoman DeFillippo,

The Borough of Closter strongly supports the inclusion of the Northern Valley Greenway project in Plan 2050. The project proposes turning 8 miles of the dilapidated and unused Northern Branch Corridor into a biking and walking path. Closter residents need safe areas to walk and bike. The roads connecting Closter to other towns in the Northern Valley have one lane in each direction and speed limits of 40 miles per hour.

The Northern Valley Greenway merits additional consideration in the Plan 2050; it is only mentioned once in the draft plan. New York State has already turned its portion of the former Northern Branch Corridor into a rail trail. The Northern Valley Greenway would link to the Joseph P. Clarke Rail Trail at the New York Border, connecting it to Piermont, Orange, Nyack, and Blauvelt via the Old Erie Path and Raymond Esposito Trail. The southern terminus of the Greenway would provide access to the Hudson-Bergen Light Rail Northern Branch Corridor Extension, enhancing the use of mass transit.

The project requires financial and technical assistance that the North Jersey Transportation Planning Authority can prioritize and provide. The project traverses six small municipalities that would otherwise lack the resources and expertise to execute such a project. The NJ Department of Transportation conducted a feasibility study that found no fatal flaws. We would like to see a roadmap for the Northern Valley Greenway included in Plan 2050 to take advantage of this unique opportunity for active transportation in Bergen County.

Sincerely,

John C. Glidden, Jr. Mayor

Victoria Roti Amitai Councilwoman

Scott M. Devlin Councilman

Joseph Yammarino Councilman

CC: Hon. James Tedesco, Bergen County Executive

Borough of Closter

295 Closter Dock Road

Closter New Jersey

Alissa Latner Council President

> Jannie Chung Councilwoman

Dolores Witko Councilwoman Mayor ANTHONY TALERICO, JR.

Council KEVIN L. GONZALEZ, President JASMINE STORY JOSEPH OLSAVSKY MARK REGAN, JR. MARIA ESCALANTE DANIELLE M. JONES



Office of the MAYOR 47 Broad Street Eatontown, NJ 07724 Tel: 732 389 7623 Interim Administrator WILLIAM P. LUCIA III

Borough Clerk

Borough Attorney
ANDREW BAYER

Borough Engineer EDWARD W. HERRMAN

August 2, 2021

Ms. Kathryn A. De Fillippo, Chair North Jersey Transportation Planning Authority *Via email only to*: Plan2050@njtpa.org

Re: Public Comment on the NJTPA Long Range Transportation Plan

Dear Ms. De Fillippo,

Thank you for the opportunity to offer comments on the NJTPA's Long Range Transportation Plan. I am writing to advance a regional initiative that I feel would best be guided by your organization: the creation of a regional bike and pedestrian network in central Monmouth County. While cooperation between municipalities should always be encouraged, the long term planning, study and financing that would be needed here requires regional coordination.

The idea starts with a focus on popular attractions such as the beach, the racetrack, Monmouth University, Monmouth Mall, etc. and creates a network that spans across several towns. A <u>Bike to the Beach</u> route could use the median of State Highway 36 to connect bicyclists to Long Branch beaches. Then, working west, the network would span through Oceanport (Racetrack), West Long Branch (Monmouth University), and Eatontown (Monmouth Mall). Route 36 runs into Hope Road where the path would connect into Tinton Falls (home of the Fort Monmouth Recreation Area) and then pick up adjoining municipalities such as Shrewsbury, Little Silver, Fair Haven and Rumson via Sycamore Avenue and other routes. It could also then connect to Sandy Hook via Ocean Avenue and to the existing Henry Hudson Trail.

The Borough of Eatontown is committed to the advancement of Complete Streets. In fact, Eatontown is proud to be the first town in the State of New Jersey to adopt by ordinance the NJDOT Complete and Green Streets for All Policy. I am currently working with the NJ Bike and Walk Coalition on the advancement of this initiative by other municipalities. In addition, I and other Eatontown representatives have spoken at statewide conferences on our commitment to Complete Streets. Eatontown and its Complete Streets Advisory Committee would be happy to work with you on this initiative.

I am well aware that a project of this scale would be an enormous undertaking. At the same time, I believe that the traffic and development of Monmouth County warrant out-of-the-box thinking to bring opportunity and equity to the area of bicycle and pedestrian access. I welcome the opportunity to meet with you or your designee to discuss this idea further.

Thank you

Anthony Talerico, Jr. Mayor



Hello, my name is Andrew Mikesh and I am the team leader for the Northern Valley Greenway, a combination grassroots and interlocal municipal initiative to convert almost 8 miles of an unused railroad ROW to a multi-use "Active Transportation" corridor. Today I am speaking as an individual advocate, though plan to follow-up with a written comment later.

I understand that this is a long term planning document, so I will try to keep my comments focused away from NVG specifics. As bicycle and pedestrian advocates in the New Jersey community, we want to ensure that the goals, policies, and programs in the LRTP are consistent with the vision of a bikeable and walkable New Jersey. The future of our state should include easy, safe, and active ways to move around! From what I can tell, NJ is shamefully behind what other states, like NY and PA have enabled. Many states are crisscrossed with modern, well-funded "Active Transportation" paths. My understanding is that just NY STATE has poured hundreds of millions of dollars in just one year into their bicycle network. We appreciate the NJTPA's Plan 2050 focus on Active Transportation, but given the grossly inadequate focus on this topic so far, I would like to see the addition of a more focused implementation and funding strategy, along with the overall strategic direction for our Region.



As far as specific additional content, I would like to suggest:

- Include additional information on the challenges of local communities face in the acquisition and preservation of corridors, be it rail or other types of opportunities for extending active transportation networks.
- Include additional, non-transportation benefits of greenways, like their use as horticultural corridors, educational partnerships with local communities, active and passive recreational spaces, "last mile" connectors for NJ Transit, NJ Safe Routes to Schools, etc.
- Include greenway projects mentioned in Plan 2050 also in the Background Paper, for example the NVG in northeastern Bergen County, where there is a serious lack of safe, off-road corridors for active transportation. For example, the NVG will be a strategic connector for NJ to hook up to the extensive NY state network of active transportation projects
- Given the high level of public interest and need for urgent action, the plan document should also propose an implementation strategy for enhancing NJ's Active Transportation focus.



Active Transportation Implementation Strategy Recommendations:

- Include stakeholder participation by Developing a Transportation advisory panel with participants from key governmental partner and advocacy organizations as well as the greenways already mentioned in Plan 2050.
- Fast track implementation by partnering with local advocacy groups, like the NJ Bike and Walk Coalition, to develop and fund a center of competency to help with the interpretation and implementation of the Greenway Development Guidebook and support strategic, local initiatives during the various phases of approved active transportation projects.
- Budget for and develop a process to evaluate and then actively support strategic, regional active transportation project initiatives, like the NVG.
- Plan for a pilot program for the Active Transportation strategy, like the NVG. The NVG has already acquired a wide range of local, regional and state support and a thorough, NJDOT funded Technical Assistance Study that did not identify any showstoppers. The NVG is also included in the Bergen County Parks Master Plan as a 'visionary" initiative. The active inter-local municipal committee, large team of advocates, huge regional public support and deep-rooted municipal Mayor and Council resolutions of authorization and support from all six towns along the available Right of Way present an idea candidate for a pilot program

NJTPA Statewide TIP and Regional TIP comments:

Hello, my name is Andrew Mikesh and I am the team leader for the Northern Valley Greenway (NVG), a combination grassroots and interlocal municipal initiative to convert almost 8 miles of an unused railroad ROW to a multi-use "Active Transportation" corridor. These are my comments as an individual advocate, not as a representative of the NVG.

<u>Safety</u> and <u>Active Transportation</u> are apparently top priority findings for the NJTPA's outreach research. Greenways are designed to provide a safe, off-road active transportation system for our region. As bicycle and pedestrian advocates in the New Jersey community, we want to ensure that the goals, policies, and programs in the (S)TIP are consistent with the vision of a bikeable and walkable New Jersey. The future of our state should include robust, attractive and safe active transportation corridors! From what I can tell, NJ is shamefully behind what other states and even most of the world has enabled. Many states and developed countries are crisscrossed with modern, well-funded off-road "Active Transportation" networks. My understanding is that just NY STATE has poured hundreds of millions of dollars in just one year into their bicycle network.

I did a quick review and search for "bicycle" of both the STIP and TIP. While there were numerous projects and initiatives listed for bicycle related activity, most of them seemed to be in association with road or safe streets to school projects. I did not find any project that seemed to be an independent active transportation corridor initiative, though obviously the TIP documents don't include detailed project descriptions and use a lot of acronyms.

We appreciate the NJTPA's Plan 2050 focus on Active Transportation, but I would like to see the addition of a more focused implementation and closer-in funding strategy for independent active transportation corridors, along with the overall great strategic direction being documented for our Region.

PLAN 2050 is a long-term, strategic vision with potentially decades of planning and implementation timeline. NJ and our Region needs financial and professional support NOW, not in 10+ years. The (S)TIP selection and funding process could bridge the gap in prioritizing additional carefully selected, ACTIVE TRANSPORTATION initiatives, to get the support they need now, not in 10+ years.

- Local (municipal, regional) active transportation corridor (Greenways) initiatives face unrealistic hurdles and challenges in organizing and getting their projects to become part of the (S)TIP.
 Given these challenges, ACTIVE TRANSPORTATION projects need additional, focused intervention now to help with the challenges in managing/planning for the acquisition and preservation of corridors, be it rail or other types of opportunities for extending active transportation networks.
- Leverage additional, non-transportation benefits of greenways, like their use as horticultural corridors, educational partnerships with local communities, active and passive recreational spaces, "last mile" connectors for NJ Transit, NJ Safe Routes to Schools, etc.
- Include greenway projects already mentioned in Plan 2050 for pilot (S)TIP projects, for example the Essex Hudson Greenway connecting Essex and Hudson counties, the Northern Valley Greenway is in northeastern Bergen County, where there is a serious lack of safe, off-road corridors for active transportation are excellent candidates for pilot programs. Projects like the NVG will also be a strategic connector to the extensive NY state network of active transportation projects

Active Transportation Implementation PLAN Recommendations:

- NJTPA should take the lead in driving change. Create an Active Transportation advisory panel of key stakeholders, like governmental partner agencies, advocacy organizations as well as the Greenways already mentioned in Plan 2050.
- Fast track implementation by partnering with local advocacy groups, like the NJ Bike and Walk Coalition, to develop and fund a center of competency to help with the interpretation and implementation of the Greenway Development Guidebook and support strategic, local initiatives during the various phases of approved active transportation projects.

- Budget for and develop a process to evaluate and then actively support strategic, regional active transportation project initiatives, like the ones already mentioned in Plan 2050.
- Plan for a pilot program for the Active Transportation strategy, using the projects already listed in Plan 2050. These projects already have the traction, support and whereabouts to participate. For example, the NVG has already acquired a wide range of local, regional and state support and a thorough, NJDOT funded Technical Assistance Study that did not identify any showstoppers. The NVG is also included in the Bergen County Parks Master Plan as a 'visionary" initiative. The active inter-local municipal committee, large team of advocates, huge regional public support and deep-rooted municipal Mayor and Council resolutions of authorization and support from all six towns along the available Right of Way present an ideal candidate for a pilot program

From:	Devil"s Tea Table Alliance
То:	<u>Plan2050</u>
Cc:	Devil"s Tea Table Alliance; susan wells; Stephen Freeman
Subject:	Comments to NJTPA on the NJDOT RT 29 rockfall mitigation project in Kingwood Twp., Hunterdon County.
Date:	Friday, July 23, 2021 9:03:34 AM
Attachments:	NJTPA Comments 7 23 21.pdf

DEVIL'S TEA TABLE ALLIANCE New Jersey-Pennsylvania

July 23, 2021

Comments to NJTPA on the NJDOT RT 29 rockfall mitigation project in Kingwood Twp., Hunterdon County.

From: Susan Wells on behalf of the Devil's Tea Table Alliance

Who we are:

The Devil's Tea Table Alliance (DTTA), is a group of concerned residents and businesses from Hunterdon County, NJ and Bucks County, PA who are growingly concerned with the New Jersey Department of Transportation (NJDOT) planned rockfall mitigation project along three miles of Route 29 in Kingwood Twp. including the Devil's Tea Table area. The DTTA has grown to over 600 members since its start in Jan 2021.

Request:

The Devil's Tea Table Alliance respectfully requests the NJTPA pause funding of the above captioned projects and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

Justification:

While the New Jersey Department of Transportation's (NJDOT) planned rockfall mitigation project along Route 29 in Kingwood Township is designed to improve public safety by remediating the rockface and installing rockfall control measures, this area is within the Lower Delaware Wild & Scenic River corridor and provides "remarkable scenic values." The area also parallels the Delaware River Scenic Byway, a designation by the USDOT, endorsed by the NJDOT. The area also has unique local, historical and geological significance, and holds religious significance to Native American peoples. The area to be impacted contains at least three tributaries to the Delaware River and a number of endangered species inhabit the impacted area.

The area is widely regarded as one of the most scenic areas in the country and attracts thousands of tourists to this portion of the river corridor.

The project is a massive undertaking and will dramatically affect the "remarkable scenic values" of the three-mile area. It currently includes:

- Widespread removal of trees and vegetation,
- Blasting on much of the rockface, rock removal, scaling and reinforcement,
- Installing metal mesh or "draping" materials to the rockface, the creation of a new barrier or a "catchment ditch," and,
- Applying concrete(shotcrete) to the smoothed rockface around and including the Devil's Tea Table geologic structure,
- Disrupting the flow of three stream tributaries to the Delaware River

When and if complete, the mitigation as planned will radically change the visual nature of the river valley in the area, forever.

Residents living in Kingwood Township, NJ and Tinicum Township, PA, anyone driving, hiking, or biking on either side of the river and the adjacent trails and anyone boating, fishing, tubing, swimming in the river will see a very different, industrial-looking rockface after the mitigation project is complete.

The project will negatively impact wildlife including a number of endangered species of plants, animals and fish living in the area, and could damage wells, septic systems and homes of residents in the area.

The project will negatively impact tourism businesses and property values in the area.

The pending road closures and delays along RT 29 will increase traffic congestion and reduce safety.

NJDOT contends they do not need public hearings or any environmental impact studies to move ahead with the project as it is a public safety issue, yet an OPRA request revealed NJDOT has no records of accident or injuries from rockfall incidents in the area.

NJDOT presents minimal and questionable rockfall data to justify this dramatic project, now priced at \$33 million federal dollars.

The rockfall hazard scores used to justify the project are from a 1994 study. Since then large trucks have been banned which should reduce those scores. Also looking at the rockfall hazard data that generated the 1994 scores, some of the rockfall data is questionable and we suggest those be redone.

Rt 29 in kingwood remains a low traffic volume, wide, mostly flat, straight, country road with full-lane paved shoulders, a relatively low speed limit that could be lowered to reduce risk.

Four of the eight options offered in the 2015 HNTB Concept Development Report to address the NJDOT rockfall concerns (quoted below), offer far less aggressive and destructive mitigation solutions, but were never discussed with the public, community stakeholders or elected officials that we know of. Those options all need to be carefully reconsidered. Those options include:

"Option 2—**Warning**: install rockfall warning fence. This option would not reduce rockfall hazard but would reduce the risk through the installation of warning fences to protect the safety of the traveling public.

Option 3 -- Monitoring: Inclineometer, tiltmeter and/or routinely scheduled LiDAR surveys. This option would not reduce rockfall hazard but would reduce the risk through the installation of monitoring instruments to protect the safety of the traveling public

Option 7 – Protection: Raise roadway elevation or shift roadway west. This option would protect the highway by creating a catchment area.

Option 8 -- Protection: Rock shed over road. This option would protect the highway by constructing a rock shed over the highway."

From studying the available NJDOT rockfall data, the areas of most risk seem to cluster in relatively narrow portions of the 3-mile area and the existing negligible risk could be greatly mitigated by enabling one or more of above in those areas.

Others in the area share our concerns:

In March 2021, Kingwood Township passed a resolution opposing the project based on failure by NJDOT to answer pressing questions raised by Twp. stakeholders, and NJDOT's desire to have the project excluded from environmental assessment and receive a categorical exclusion under NEPA.

Also in March, The Lower Delaware Wild and Scenic Partnership sent a request to Hunterdon County raising many serious concerns about the project and urging the county to get involved.

On April 20 Hunterdon County Commission voted unanimously to enact a resolution requesting NJDOT halt the Rt. 29 rockfall mitigation project until it is further reviewed by the

community, its agencies and elected public officials, and appropriate environmental assessments are conducted.

On May 5th, at the urging of the Frenchtown Environmental Commission, that borough passed a resolution supporting Kingwood and Hunterdon and echoing their concerns and requests.

On June 5, the Tribal Council of the Lenape Nation of PA voted to oppose the project and penned a strong letter of concern to all involved.

On July 13, the Tinicum Twp. Bucks County PA, Board of Supervisors, passed a resolution supportive of resolutions from several neighboring NJ municipalities. That resolution expressed concern over damage to the area's environment, view shed, wildlife, economy and sites of historical and religious significance to Native American Tribes if the project proceeds as planned.

Additionally, extensive reporting by USA Today reporters over the last year has revealed serious questions about how the NJDOT has developed several rockfall projects including the Rt. 29 project. All are using federal funds and all similarly avoid consultation with local officials, resist environmental impact reviews, are based on very questionable rockfall data, are not based on a cost benefit analyses, start small and grow exponentially in price and scope, and benefit the same group of contracting firms.

Thank you for considering our request.

Respectfully yours, Susan Wells for the Devil's Tea Table Alliance 215 Tumble Idell Rd, Frenchtown, NJ 08825

From:	Jim Friedlander
То:	<u>Plan2050</u>
Subject:	Devil"s Tea Table
Date:	Friday, July 23, 2021 10:18:12 AM

As a resident of PA (my home is at 25 Mount Airy Road in Pipersville PA 18947) I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Twp. and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders (including affected businesses and residents in NJ & Pennsylvania) in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

Sincerely, Jim Friedlander

--James Friedlander President jim@museumtravelalliance.com

Museum Travel Alliance 1040 Avenue of the Americas, FI 23 | New York, NY 10018-3721 T: 212-324-1893 / 855-533-0033 Facebook | Twitter | Instagram | LinkedIn

From:	Rick Balukas
To:	<u>Plan2050</u>
Subject:	Rt 29 Rockfall Mitigation project in Kingwood Twp, New Jersey
Date:	Friday, July 23, 2021 11:49:19 PM

I respectfully request that the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Township and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

Sincerely,

Dr. Richard Balukas

From:	Susan Jacobi
То:	<u>Plan2050</u>
Subject:	Comment on Rock fall project
Date:	Saturday, July 24, 2021 6:27:02 AM

I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Twp. and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

<mark>Sue Jacobi</mark> Tinicum Township, PA

From:	Craig M deGroot
To:	<u>Plan2050</u>
Subject:	Proposed Rt 29 Kingwood Township Rockfall Project
Date:	Saturday, July 24, 2021 8:34:44 AM

To NJTPA: I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Township. The proposed scale and scope of work far exceeds the purported risk. There have been no major rock falls and no injuries to people or vehicles. The scenic beauty that is the Devil's Tea Table - along with it's historic and sacred past would be forever lost and replaced with a wall of shot-crete. NJDOT needs to return to the Concept Development Phase and involve local elected officials, the communities on either side of this scenic river corridor and other stakeholders to evaluate the best and least destructive options to reasonably minimize any real rockfall risks in these areas.

Thank you -

Craig M deGroot Tinicum Township, Bucks County, PA <u>craigdegroot@me.com</u> 646-239-7515 Lindsay Napolitano 38 Hill Rd. Frenchtown, NJ 08825

I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Twp. and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

In addition, I have personal concerns for the safety of my well (our only drinking water access), which is likely within the blast zone of construction.

Thank you, Lindsay

From:	Shauna Morrison
То:	<u>Plan2050</u>
Subject:	Rockfall Mitigation Project
Date:	Saturday, July 24, 2021 10:58:03 AM

I, Shauna Morrison, living at 350 Tunnel Rd, Asbury NJ 08802 respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Twp. and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

And, stop spending our tax dollars frivolously and without proper oversight. It's outrageous.

Thank you for your attention.

Shauna Morrison

From:	Joanne Lund
То:	<u>Plan2050</u>
Subject:	Rt29 Rockfall Mitagation Plan
Date:	Monday, July 26, 2021 8:29:28 AM

I was a long time resident of Bucks County who still passionately cares about the preservation of this wild and scenic place and lived directly across the river from the Devil's Tea Table for 13 years, I respectfully ask that this project in Kingwood Twp. and the other active projects in Hunterdon and Warren counties be paused in order to:

--Require NJDOT to return to the Concept Development Phase,

--Meaningfully involve local elected officials and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. --And to assure that thorough and adequate environmental, historical and archaeological impact studies are conducted by gualified independent professionals.

Thank you for your consideration, Joanne Lund (formerly) 50 Bridge 4 Lane Pipersville, PA 18947

From:	Hank Wiese
То:	Plan2050
Subject:	Comments to NJTPA on the NJDOT RT 29 rockfall mitigation project in Kingwood Twp., Hunterdon County
Date:	Monday, July 26, 2021 9:09:11 AM

To: North Jersey Transportation Project Authority (NJTPA). From: Henry R. Wiese, Vice President of Operations, Friends of Treasure Island

I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Township and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase. Please more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas and assure that qualified independent professionals conduct a thorough and adequate environmental, historical and archeological impact studies.

Subscribe to our "Email Blast" at http://www.friendsoftreasureisland.org/eblast/

HOW! HOW! Still Abiding,

Hank

Henry R. Wiese Vice President of Operations Friends of Treasure Island 410.340.9907 HankW@friendsoftreasureisland.org www.friendsoftreasureisland.org "TI is like a trip to heaven without die'n". Butts MacMillan and Cal Edwards, Troop 160, CoLC, BSA. NJTPA Warren & Hunterdon Rockfall Plans & Plan 2050,

Hello - this is the first letter to be sent from our I80DWG Coalition letter campaign. Please reach out if you have any questions. Thank you. Tara Mezzanotte - Founding Member I80DWGCoalition / I80DWGCoalition@gmail.com 908-656-4603

Please take every action possible to secure an investigation into these rockfall projects, help FHWA mandate an EIS, help NJTPA pause funding and help the NJDOT study solutions to the many I-80 S-Curve safety, mobility and congestion issues in the Delaware Water Gap incorporating appropriate rockfall mitigation into one project.

The well-known robust public record against the controversial Warren and Hunterdon projects highlight their many complicated issues. The I80DWG Coalition investigation did located the possible source of all the controversy - the NJDOT may have violated their own project development policy. Their own Policy Manual outlines procedures in place to to ensure our tax dollars are spent on projects with justified scope of work, based on a strong well defined purpose and need, with clear goals and objectives. Required steps in the Capital Project Delivery system appear to have been skipped. Documents requested have been denied. The I80 S-Curve project in particular appears to have a had major scope change before the Preliminary Engineering phase with NO required studies or analysis conducted to support the change. Between development phases NJDOT completely cut Knowton Township out of the required Public Involvement Plan. Knowlton was cut out at a time when Knowton and Warren County were publicly objecting to the Route 46/Jurassic Fence Project. In addition, NJDOT cut Warren County and Hardwick out of early updates and involvement.

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FACT: \$150M rockfall mitigation money for Hunterdon and Warren County projects can be used on other safety projects! NJDOT finally clarified that it chooses to allocate this "safety" money to the rockfall mitigation program instead of other safety projects. It is not a "use it or loose it to another state" situation. Rockfall projects are NOT funded with federal "rockfall" tax dollars, 20% even comes from tolls collected in NJ.

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Thank you!

tara mezzanotte i80dwgcoalition@gmail.com 59 Stark Road columbia, New Jersey 07832 Sirs:

I respectfully request the NTPTA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Township.

Please involve the local officials and other stakeholders in evaluating the best and least destructive options to minimize any REAL rock fall risks in these areas.

Elliott D, Maser, DDS 106 Mill Creek Road Holland, Pa. 18966

Ab/Ba/Saba/Pops/Dad et. al. Elliott D. Maser, DDS 106 Mill Creek Road Holland, Pa. 18966-2030 215-953-0624(H) 215-802-5708(C) edmaser1@cs.com NJTPA Warren & Hunterdon Rockfall Plans & Plan 2050,

Add Personal note here (Optional):

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Thank you!

Raymond Miller raymond_miller@yahoo.com 597 POPLAR VALLEY RD W STROUDSBURG, Pennsylvania 18360

From:	Malcolm Leslie
To:	Plan2050
Subject:	Help investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!
Date:	Monday, July 26, 2021 12:22:20 PM

NJTPA Warren & Hunterdon Rockfall Plans & Plan 2050,

Add Personal note here (Optional):

An Environmental Impact Study must be done for every one of the rockfall projects. This appears to be the one study that NJDOT is trying to avoid doing. That should tell us all that something is being covered up. I do hope you will demand the study gets done.

Please take every action possible to secure an investigation into these rockfall projects, help FHWA mandate an EIS, help NJTPA pause funding and help the NJDOT study solutions to the many I-80 S-Curve safety, mobility and congestion issues in the Delaware Water Gap incorporating appropriate rockfall mitigation into one project.

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Thank you!

Malcolm Leslie mleslie105@yahoo.com 101 Foul Rift Rd Belvidere , New Jersey 07823 Ms NJTPA Warren & Hunterdon Rockfall TIPS & Plan 2050,

Add Personal note here (Optional):

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Brian Barends bbarends@comcast.net 3 McKinley Ave Washington, New Jersey 07882 NJTPA Warren & Hunterdon Rockfall TIPS & Plan 2050,

Please take action!

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Karen L Kooi

Katen Kooi reinkarenkooi@gmail.com 84 Auble Rd Blairstown , New Jersey 07825 NJTPA Warren & Hunterdon Rockfall TIPS & Plan 2050,

Add Personal note here (Optional):

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Curve roadway design safety problems, discussed putting up signs with local EMS concerned for their own safety, and conducted a crash study which shows the safety issues in the S-Curve are NOT from rockfall events.

- The 2011 NJDOT I80 S-Curve Rockfall Concept Development Report noted on page 5: "The Route I-80 roadway carries several safety deficiencies that also contribute to high crash rates. These safety deficiencies include substandard sight distances, narrow shoulder width, and substandard horizontal radii."

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Thank you!

Charles Feuker tonilawnstolaps@gmail.com 574 Route 94 Columbia , New Jersey 07832

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Donna Price dprice5710@gmail.com 4115 Goleys Lane Racine, Wisconsin 53404

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Lucia Frazier lulu2547@verizon.net 102 Avenue A Bayonne, New Jersey 07002

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George Allaman gallaman3@gmail.com 18 Greendell Road Newton, New Jersey 07860

From:	Susie Ray
To:	Plan2050
Subject:	Help investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!
Date:	Monday, July 26, 2021 7:45:37 PM

Add Personal note here (Optional):

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Susie Ray ray88714@gmail.com 15206 Torry Pines Houston, Texas 77062

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Adrienne Edwards adrienne05@embarqmail.com 101 Delaware rd Columbia , New Jersey 07832

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Lary Range Irange@ptd.net 22 Bento Rd Columbia, New Jersey 07832

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Ann Hartig anncusterh@gmail.com 39 Hainesburg River Rd Columbia, New Jersey 07832

From:	Jon Beaulieu
To:	Plan2050
Subject:	NEW-SIGN to investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S- Curve in the DWG!!
Date:	Wednesday, July 28, 2021 4:52:12 AM

Please take every action possible to secure an investigation into these rockfall projects, help FHWA mandate an EIS, help NJTPA pause funding and help the NJDOT study solutions to the many I-80 S-Curve safety, mobility and congestion issues in the Delaware Water Gap incorporating appropriate rockfall mitigation into one project.

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Thank you!

Jon Beaulieu

jbmsgnco@yahoo.com 212 Schoonover In East Stroudsburg , Pennsylvania 18301

Add Personal note here (Optional): keep our Gap natural as is.

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Thank you!

Kathy Pritchard fuchs.k@gmail.com 41 Countryside Road Knowlton, New Jersey 07832

Add Personal note here (Optional): I write to you with major concerns regarding the "rockfall project" that is proposed by the NJDOT. I am a resident of Portland, PA, and use route 611 as well as route 80 consistantly. I know the effects of traffic being blocked or stopped on route 80 due to an accident in the "S-curve" located between exits 4 and the NJ/PA border. The scenic route of 611, which moves through our DWG National Park gets inundated. Its lovely twists, turns, and curves that hug the Delaware River become heavy traffic on its narrow two-lane space. I fear if this road is used as a detour route or an alternate route to congestion on Rt80 during major construction, that eventually the wear and tear would compromise the integrity of Rt. 611. I envision it sliding down into the river someday. This brings me to my second thought.

If after careful consideration and proper research is conducted it is determined that some type of rockfall mitigation is necessary then so be it. HOWEVER, many see the s-curve as the elephant in the room. Almost daily there is an accident. How many are caused by rockfall? I have seen the stats on this and logically it seems that the s-curve issue far outweighs the rockfall issue.

I believe the residents and professionals should have input into these valid concerns when the pricetag seems to continue to rise. What would be best, the most effective issue to consider???

Please take the time to be open, honest, and do the right thing.

Please take every action possible to secure an investigation into these rockfall projects, help FHWA mandate an EIS, help NJTPA pause funding and help the NJDOT study solutions to the many I-80 S-Curve safety, mobility and congestion issues in the Delaware Water Gap incorporating appropriate rockfall mitigation into one project.

The well-known robust public record against the controversial Warren and Hunterdon projects highlight their many complicated issues. The I80DWG Coalition investigation did located the possible source of all the controversy - the NJDOT may have violated their own project development policy. Their own Policy Manual outlines procedures in place to to ensure our tax dollars are spent on projects with justified scope of work, based on a strong well defined purpose and need, with clear goals and objectives. Required steps in the Capital Project Delivery system appear to have been skipped. Documents requested have been denied. The I80 S-Curve project in particular appears to have a had major scope change before the Preliminary Engineering phase with NO required studies or analysis conducted to support the change. Between development phases NJDOT completely cut Knowton Township out of the required Public Involvement Plan. Knowlton was cut out at a time when Knowton and Warren

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I am not contesting that rockfall mitigation may be required in the project areas. I am contesting that the proposed plans are rational, effective, or considerate of the harms that will result to our local citizens and environment. With so many outstanding questions, I request every official and decision maker assist to have funding for these projects paused pending an investigation, FHWA mandate an immediate EIS, the projects go back to Concept Development, and NJDOT begin to study solutions to the safety, mobility and congestion issues in their I-80 S-Curve.

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FACT: The well-documented dangers of the I80 S-Curve have not yet been addressed, and they are a much greater threat to public safety. Over 10 years ago the NJDOT identified I80 S-Curve roadway design safety problems, discussed putting up signs with local EMS concerned for their own safety, and conducted a crash study which shows the safety issues in the S-Curve are NOT from rockfall events.

- The 2011 NJDOT I80 S-Curve Rockfall Concept Development Report noted on page 5: "The Route I-80 roadway carries several safety deficiencies that also contribute to high crash rates. These safety deficiencies include substandard sight distances, narrow shoulder width, and substandard horizontal radii."

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Thank you!

Cindy Nelson clnatrbc@yahoo.com PO Box 672 Portland, Pennsylvania 18351

Add Personal note here (Optional):

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Florence Glancey Florenceglancey@gmail.com 86 Lime Kiln Rd Columbia , New Jersey 07832

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Thank you!

Thank you so much for doing so much to keep our DWG beautiful.

John Kulp john.r.kulp.civ@mail.mil 1301 Poplar valley Road east stroudsburg, Pennsylvania 18360

Add Personal note here (Optional): Are you aware of this proposed project?

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Thank you!

Elizabeth Townsend Betsi.townsend@gmail.com 34 Hollow Horn Rd Erwinna, Pennsylvania 18920

From:	Shealynn O'Toole
To:	Plan2050
Subject:	NEW-SIGN to investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!
Date:	Wednesday, July 28, 2021 11:04:59 AM

This will directly affect our drinking water, natural resources, wildlife and quality of life.

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Subject:	NEW-SIGN to investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S- Curve in the DWG!!
Date:	Wednesday, July 28, 2021 11:33:51 AM

Dear Rep Cartwright and Senator Casey, I have been viscerally attracted to the Delaware Water Gap since I was 4-5 years old traveling thru on my way to Peckville, PA to visit my Grandparents. I believe it was 1957 when I was 5, how horrified I was that they had blasted the nose of the rock ledge on the NJ side off. I remember my dad trying to comfort me by telling me that was where the new Interstate highway was going in. It would save us an hour getting to the Scranton area form the Jersey Shore. I have hiked the Jeresey side hundreds of times over the years introducing family members, friends, and my Student Athletes at East Stroudsburg University from1997-2018 to the views and splendors of the Kittatinny Ridge. I am also a technical rock climber scaling moderate routes on the Jersey side. This project has grown into a Boondoggle! Unfortunately with the nature of Highway construction there is almost a incestuous relationship between the State Highway authorities and the very few contractors who are capable of dealing with highway construction. It wasn't planned but human nature being what it is it evolves into the parties involved serving each others interest irregardless of the actual need or cost for the project.

The only Rocks that endanger traffic are maybe tire sized rocks that are washed onto the road due to the lack of maintenance of the existing natural rock barrier and poor drainage plan where the actual nose of the mountain touches the shoulder of I-80 West bound. 95% of the Accidents are caused by driving too fast for the conditions and arcs of the "S: Curves. A much simpler Common Sense solution would be to put a humped barrier between the travel lanes in both directions from Mile marker 1.8 to the Bridge. This would prevent people from changing lanes on the "S" Curves while allowing for changing lanes at low speeds due to congestion from an accident or road work. Signage 4 mile's out would indicate that those who have Easy Pass should get into the proper lane before the divide. Being that almost all commercial trucks have Easy Pass the Easy Pass scanners should be moved to the right lane side of the toll plaza In PA, as from that point until the 1-80/380 split it is an uphill climb for heavy trucks slowing traffic, so they should keep right.

Finally it is time to rethink the Boondoggle of the I-80 expansion thru Stroudsburg as anyone with the slightest sense of observation understands that the PA 33 junction and merge with I-80 in Bartonsville is what backs up the traffic in Stroudsburg. With the widening of the Panama Canal in 2016, the subsequent proliferation of Distribution Centers in the Lehigh Valley the truck merge onto I-80 west has geometrically progressed in numbers.

I-80 should be expanded only from the North 9th Street West Bound entrance until Scotrun where three lanes occur for the steep final climb up on to the Pocono Plateau

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Thank you! Chris Merli

Chris Merli cmerli@live.com 161 Horseshoe Rd Box 649 Swiftwater, Pennsylvania 18370

Add Personal note here (Optional):

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Thank you!

Joseph Barinas sanirab@embarqmail.com 178 Stillwater Rd Hardwick, New Jersey 07825 Hi Ted,

Here is a copy the message people see prior to adding a note to the letter being sent to NJTPA. They know it is also being sent to FHWA, NJDOT and their state and fed legislators. I would like the message to be added to our record in some way please.

Please sign & help a few others to sign - NJTPA Public Comment closes August 4th

WE DID IT! SUPPORT MISSION ACCOMPLISHED! After years of actions & outreach these rockfall projects are finally being slowed down and closer to being investigated in a way the tax-paying residents, business owners, commuters, river and park recreationists and the environment deserve. NJTPA recently helped to facilitate the long sought after meeting between NJDOT executives and Warren County. Well done!!! It is time for the next step. We did uncover evidence of potential NJDOT wrongdoing worthy of an investigation. Click **START WRITING** to send your letter. Read below to understand key issues.

Our battle urgently needs your signature to help pause funding pending a complete independent investigation. One click shares the letter with EHWA NITRA NIDOT and your state and

investigation. One click shares the letter with FHWA, NJTPA, NJDOT and your state and federal legislators. At 3500 signatures, we have closed our change.org petition to be delivered to NJTPA, FHWA and Governor Murphy on August 4th. To our knowledge, no spam or solicitation for money comes from this platform. We will send email updates and be assured, we will not share your email with others. If you have any trouble with this form, questions or wish for the evidence to be further explained, please contact us: 908-656-4603 / <u>I80DWGCoalition@gmail.com</u> / Facebook: <u>I80DWG Coalition</u>

It is time for:

- 1. **NJDOT** Warren and Hunterdon Rockfall Projects be investigated and audited, and the projects sent back to Concept Development.
- 2. **FHWA** to recognize the controversy over these projects would best be resolved by an immediate Environmental Impact Statement/Study lead by an independent outside lead agency.
- 3. **NJDOT** to study solutions to ALL the safety, mobility and congestion issues in the I-80 S-Curve, and study incorporating rockfall mitigation into a plan that resolves all these issues in one project.
- NJTPA to pause all funding on these projects based on our findings that show since 2103 they may have been making funding decisions based on incomplete, inaccurate and misleading information presented by the NJDOT.
 5.

Your signature shows our New Jersey and Pennsylvania representatives, Warren, Hunterdon & Sussex County Commissioners, municipal governments and environmental groups (Lower Delaware Wild and Scenic River Council, NJ Sierra Club, NJ Highlands Coalition & National Parks Conservation Association and Access Fund) how much we appreciate the support they give. As for those who have not yet gone on record showing support, this letter will help them to understand why now might be the time to do so. Click **HERE** to view the May 2021 investigation/audit request presented to NJTPA. Click **HERE** to view the June 2021 Knowlton Township resolution supporting our investigation/audit request and request for legislator assistance in procuring oversight. Click **HERE** to view the July 2021 Devils Tea Table Alliance letter to NJTPA.

Thank you Tara

From: Plan2050 <Plan2050@njtpa.org>
Sent: Monday, July 26, 2021 12:21 PM
To: Tara Mezzanotte <i80dwgcoalition@gmail.com>
Subject: RE: Help investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!

Thanks; you, too. Yes, we've been getting a lot of comments and are organizing them for responses hopefully soon.

Ted Rítter

Manager External Affairs **North Jersey Transportation Planning Authority** One Newark Center, 17th Floor Newark, NJ 07102 973-639-8447 office 973-202-2909 mobile www.linkedin.com/in/ted-ritter-9231743/

From: Tara Mezzanotte <i80dwgcoalition@gmail.com>
Sent: Monday, July 26, 2021 12:14 PM

To: Plan2050 <<u>Plan2050@nitpa.org</u>>

Subject: Re: Help investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!

Glad to know it is received. Enjoy the day Ted.

Tara

On Mon, Jul 26, 2021, 12:12 PM Plan2050 <<u>Plan2050@njtpa.org</u>> wrote:

Thanks, Tara, for your comments.

Ted Rítter

From:	Nancy Jones
To:	Plan2050
Subject:	NEW-SIGN to investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S- Curve in the DWG!!
Date:	Wednesday, July 28, 2021 2:18:23 PM

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Thank you!

Nancy Jones

jonesnjb@aol.com 2 State Route 94 Blairstown, New Jersey 07825 Dear County Representatives,

Bergen county has a unique opportunity to convert the unused rail trail into something that will transform this area.

The pandemic highlighted the need to focus on reclaiming this land for community use even more.

This isn't an exclusive club - it is a wonderful opportunity to link all of our towns. Please consider supporting efforts by highlighting the Northern Greenway in your plans to help all of us build awareness.

Only a few miles north the bike trail in NY state is an incredible success. Think of what that corridor could do for our local businesses as well.

Walking and riding on these roads is not safe in many areas. A multi use trail would provide benefits for many people with various interests.

Please consider adding the Northern Valley Greenway to your plan.

Thank you and have a great rest of the summer -

Todd

Todd Adelman Demarest, NJ 617.448.4688 tadelman1@gmail.com

Please add this to reasons we feel the rockfall projects should be investigated before another penny is authorized, why an immediate EIS is required and the project be start over! It is time for intervention and an independent review. Conflict of interest!! How are we allowing Dewberry to conduct these studies. They are the contractor, who will is getting all the NJDOT rockfall contracts AND Final Design.

See today's NorthJersey.com article:

https://www.northjersey.com/story/news/transportation/2021/07/29/route-80-rockfall-mitigation-project-delaware-water-gap-pushed-back/7995517002/

Posted on our FB Page today:

MAJOR PROJECT DELAY & MONEY QUESTIONS!

"My question is: Why hasn't any cap been put on these subcontractors? They're allowed to spend into infinity," - Knowlton Mayor Adele Starrs

NPS and Native American Tribes fight to PRESERVE OUR GAP - Require more studies! Delayed 2 more years!

Warren and Hunterdon County finally get a seat at the table to represent our interests! The previous DWG studies were not sufficient! Just like the Traffic Study, the Visual Impact Assessment...and every single presentation we have record of. EVERY document and presentation has NOT been sufficient, contained incomplete and incorrect information - every sing one!

FACTOID: the DWG timeline on the project website has not been updated since June 2020!

Here is the article:

The controversial Route 80 rockfall mitigation project in the Delaware Water Gap has been delayed again.

A public hearing for the environmental review, which was supposed to be held in early fall 2020, has now been pushed back until late 2022.

The delay is a result of the agency's recent "coordinating and consulting" with federally recognized tribal nations that have ancestral land in the proposed project area, which is in the Delaware Water Gap National Recreation Area in Knowlton and Hardwick,

said Stephen Schapiro, a spokesman for the New Jersey Department of Transportation. "At the tribes' request, NJDOT is in the process of doing a second archaeological study that includes areas that are outside of the project limits, but near the project," Schapiro said. The department did not involve at least one of the tribes in the project until 2018, when the Federal Highway Administration intervened.

The federal environmental review process is not expected to conclude until May 2023.

After that, the FHA would issue a decision on the environmental review before construction can begin.

By then, planning on this project will be well into its 12th year, and calls are increasing for the DOT to go back to the drawing board because of swelling costs and scope.

1,000% increase in charges

As the planning phase of the Route 80 project has slogged, Dewberry Companies Inc. has raked in more than \$10.5 million in consultant fees since it was hired by the department in 2013 for a \$915,614.48 contract.

Here are some of the reasons for change orders that resulted in the increased fees to Dewberry from 2018 to 2020, according to new documents obtained in a public information request:

Address continued "concerns expressed by the National Park Service" when it comes to the aesthetic or visual impacts to the area, an issue cited in two change orders from 2015 and 2018.

Conduct studies to collect traffic data, noise and vibration.

Begin collecting "historical evidence of rockfall events, assess ground deformation" because "stakeholders believe that the purpose and need for the project is over represented by NJ DOT."

Repeat a LiDAR (digital terrain model) survey, which was also done in 2013, to assess "ground surface changes." This, Schapiro said, is being done a second time to "investigate surface movement of rock and slope materials. Additional LiDAR will also be used in further environmental studies."

Renew a license for a 3D model, which is still in development, that will be used for the "public outreach process," costing \$14,700 for a year. It was renewed because "the timeline of the project was extended to prolong coordination with local elected officials," Schapiro said.

"Additional information is regularly gathered to refine design plans and specifications," Schapiro said about the need for change orders.

Story continues below gallery

The contract signed with Dewberry in 2013 said the work would be done in a year. Instead, the company has worked on this for eight years, received yet another extension, and requested and received approval for 10 change orders, and the costs charged by the firm have increased more than 1,055% — most of which was paid for using federal taxpayer dollars.

"Dewberry has not delayed or failed to meet scheduled deadlines," Schapiro said.

"Additional costs and schedule changes are a result of added work required to advance the project under the expanded NEPA requirements, and also address local concerns, which is over and above the original Scope of Work."

Dewberry's consultant fees for this project highlight excessive spending without oversight, said Knowlton Mayor Adele Starrs, who obtained Dewberry's contract and change orders through a public information request.

"My question is: Why hasn't any cap been put on these subcontractors? They're allowed to spend into infinity," Starrs said, also raising concern about the direction the DOT has given

Dewberry about how to conduct its environmental review.

'Open line of communication'

The money going toward rockfall projects across the state has become a flashpoint in some of the communities where they are planned and among officials at all levels of government. Local officials from Knowlton and a coalition of community members, dubbed the 180dwgcoalition, have called on the North Jersey Transportation Planning Authority (NJTPA) to halt funding for the project until an audit investigating the cost, accuracy of information buttressing the project and any potential wrongdoing is concluded. The NJTPA receives and approves federal money for projects in the region, including rockfall mitigation, but it typically does not take on a watchdog role, according to officials. U.S. Rep. Josh Gottheimer, whose district includes part of Warren County, introduced an amendment this week in Congress to defund the Route 80 project until officials can find "a much smarter, safer, evidence-based solution."

Meanwhile, some county officials say they are making progress.

Warren County Commissioner Jason Sarnoski, who represents the county on the NJTPA board, has voted against the authority's Transportation Improvement Plan in years past because of inaction after concerns raised about two projects, including the Route 80 rockfall mitigation. But after a recent conversation with Transportation Commissioner Diane Gutierrez-Scaccetti, Sarnoski said he is not sure how he'll vote this year.

Sarnoski said the DOT agreed to let Warren County officials and their engineers have a seat at the table as planning on the project continues.

"[We'll] do a deeper dive into some of their planned solutions and express our concerns about what the project is going to look like, and hopefully the county could be a go-between to find reasonable solutions to the rockfall that aren't going to be intrusive and high-cost," Sarnoski said. "If we can't, I'll have to find another way, but I want to try working together and being in the room where the decisions are being made."

Hunterdon County Commissioner Zach Rich said he also recently met with DOT officials, facilitated by the governor's office, about three local rockfall projects.

One is on Route 78 in Bethlehem, estimated to cost \$46 million. That is going to bid later this summer. Another is on Route 29 in Kingwood, which is estimated to cost \$30 million and go out to bid in 2026. Members of the community raised concerns about that project disturbing a historic rock formation and residential sewer and well lines. The third is on Route 29 in West Lambertville, which isn't expected to go out to bid until 2029. "We have an open line of communication on the local level up to DOT," Rich said, adding that the agency wants to create a stakeholder group for the Kingwood project. The recent dialogue between the local and state officials developed after the county and several nearby municipalities passed resolutions indicating they wanted to meet with the DOT before the

Officials from the affected communities say they are not against finding solutions to keep rocks from potentially falling and hurting motorists, but they want the DOT to keep them apprised of these projects, address their concerns and answer questions

tara mezzanotte

project progressed.

i80dwgcoalition@gmail.com 59 Stark Road columbia, New Jersey 07832

Add Personal note here (Optional):

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Thank you!

Kevin ONeill oneillcarpet@gmail.com 13 Victoria crossing rd Columbia, New Jersey 07832

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To:	Plan2050
Subject:	NEW-SIGN to investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!
Date:	Thursday, July 29, 2021 10:15:00 AM

Funds should be used for more advanced avenues of traffic.

Stop wasting funds.

Make Highways safer by instituting a Highway Light Maintenance project or tear them down. Open the Lackawanna Cut-off.

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Thank you!

Birger Luecht Luecht@att.net 5 Mountain Shores Rd. Lake Hopatcong, New Jersey 07849

Add Personal note here (Optional):

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Rick Porvaznik rickporvaznik@gmail.com Po Box 212 Marshall's Creek, Pennsylvania 18335

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Thank you!

Ronald Aloisio raloisio08@gmail.com 411 Springdale Greendell Road Newton, New Jersey 07860

From:	Joyce Ely
To:	Plan2050
Subject:	NEW-SIGN to investigate NJDOT rockfall plans, mandate an immediate EIS & study fixes to the dangerous I80 S-Curve in the DWG!!
Date:	Thursday, July 29, 2021 5:56:40 PM

Add Personal note here (Optional):

As a lifetime resident of eastern Bucks County and the the Delaware River Basin, I have deep concerns about the necessity, cost and potential damage to the ecological health and the aesthetic beauty that will result from the current rockfall mitigation plans along the Delaware River. I fully support the Devil's Tea Table Alliance and their mission to significantly scale back this overblown project. It certainly seems to many of us that someone is just looking for reasons to spend a lot of money. The Lenape have also submitted their opposition to the plan as it now stands. I fully support their efforts. The areas in question of the water gap and at the devils tea table are priceless and cannot be replaced. Countless native trees, shrubs and herbaceous plants along with much wildlife habitat will be destroyed. Native tree communities in our area are in danger do over development, ash tree loss and a general lack of ecological knowledge about the importance of ecological communities.

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Thank you! Joyce Ely Director, Neshaminy Creek Watershed Association B.S. Environmental Biology PA DCNR Conservation Volunteer PHS Tree Tender

Joyce Ely joyceely1@gmail.com 5457 Rinker Circle Doylestown, Pennsylvania 18902

Add Personal note here (Optional):

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Thank you!

Marie Carota madpir@verizon.net 1255 Pebble Hill Rd Doylestown, Pennsylvania 18901

From:	normbill@epix.net
To:	<u>Plan2050</u>
Subject:	rt 29 rockfall mitigation project
Date:	Friday, July 30, 2021 11:07:04 AM

I respectfully request the NJTPA pause funding of the Rt. 29 Rockfall Mitigation Project in Kingwood Township, and the other active projects in Hunterdon and Warren counties, and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials and other stakeholders in evaluating the best and least destructive options to reasonably minimize any rockfall risks in these areas; and insure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

Norman MacArthur 6 Dogwood Cluster Doylestown, PA 18901

Add Personal note here (Optional):

Thanks to everyone involved. Your efforts are truly appreciated.

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Kim Schad bsakim@yahoo.com 9 Hemlock Rd Columbia, New Jersey 07832

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It is time for:

-NJDOT Warren and Hunterdon Rockfall Projects be investigated and audited, and the projects sent back to Concept Development.

-FHWA to recognize the controversy over these projects would best be resolved by an immediate Environmental Impact Statement/Study lead by an independent outside lead agency.

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Kristen Hamill Kristenlyn@embarqmail.com 138 Vail Road Columbia , New Jersey 07832

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Nicole Dallal nicoledallal13@gmail.com 8 Washington St Columbia, New Jersey 07832

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Eleanor Shelton eshelton@panix.com 943 Heiden Road Bangor, Pennsylvania 18013

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Randi Petersen randiepetersen@gmail.com 126 chippawa circle Mount bethel, Pennsylvania 18343

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Thank you!

Sigrid Sorg sigridsorg@yahoo.com 117 Mt Rascal Rd Hackettston , New Jersey 07840



Lower Delaware Wild & Scenic River Lower Delaware Scenic & Recreational River

c/o Delaware River Greenway Partnership PO Box 15, Stockton, NJ 08559 <u>www.lowerdelawarewildandscenic.org</u> <u>info@lowerdelawarewildandscenic.org</u> <u>www.facebook.com/lowerdelawarewildandscenic.org</u>

Re: NJDOT Rockfall Mitigation Projects in Warren & Hunterdon Counties Included in Plan 2050 (LRTP) and Fiscal Year 2022-2025 Transportation Improvement Program (TIP)

The Lower Delaware River is a nationally designated Wild and Scenic Partnership River. Our Management Council, composed of member governmental entities and non-profit organizations along the River, is responsible for oversight and implementation of the goals of the federally approved management plan. Among the six plan goals are preservation of the natural resources, scenic values of this stretch of the River, and the preservation of important historic resources in the watershed.

NJDOT rockfall mitigation projects as planned in Warren and Hunterdon Counties, are distinctly counter to these goals. The projects are listed in the Fiscal Year 2022-2025 Transportation Improvement Program (TIP). As currently planned, these projects will destroy remarkable scenic geological formations and Native American historical resources, as well as having negative impacts on River water quality.

Professional comprehensive environmental, historic and archeological impact studies are needed before any mitigation decisions are made. Any exclusions to national environmental regulations should not be permitted. Addressing the visual impact of these projects is absolutely necessary.

Our Council requests that the NJTPA pause funding for these projects until the NJDOT engage cooperative input from the impacted communities in Warren and Hunterdon Counties. This includes engagement with federally designated entities including Delaware River Water Gap National Recreation Area, the Delaware River Scenic Byway, and our Council. Engagement must also include all the impacted municipalities and counties on both sides of the River, many of whom have already passed resolutions regarding the proposed projects.

NJDOT has not shown sufficient data to justify the magnitude of these projects. The costs overwhelmingly outweigh the benefits that are presumed to accrue from the projects. They are universally unpopular in the impacted areas. There are many less invasive and destructive options, if indeed mitigation is needed.

In conclusion, we request that any and all project funding for rockfall mitigation projects in Warren and Hunterdon Counties, as currently proposed, be removed from the Fiscal Year 2022-2025 TIP.

Sincerely,

Marion M Kyde Ph.D. for the Management Committee, Lower Delaware Wild and Scenic River

Dear Sir/Ms.:

I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Township and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase. Please more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas and assure that qualified independent professionals conduct a thorough and adequate environmental, historical and archeological impact studies.

From what I read there are cheaper easier options. Please consider them.

Tom Brankner

Add Personal note here (Optional):

Please take every action possible to secure an investigation into these rockfall projects, help FHWA mandate an EIS, help NJTPA pause funding and help the NJDOT study solutions to the many I-80 S-Curve safety, mobility and congestion issues in the Delaware Water Gap incorporating appropriate rockfall mitigation into one project.

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Thank you!

karin p njqh2ride@yahoo.com 100 main st stockton , New Jersey 08559

Add Personal note here (Optional): hey guys - please help - thanks

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EILEEN REED eileenreed@peoplepc.com 1 EBONY COURT newtown pa, Pennsylvania 18940

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Thank you!

Jody Shick jody.shick@gmail.com 211 Krummel Ln Cresco, Pennsylvania 18326

From:	Tom Coenen
To:	<u>Plan2050</u>
Cc:	Dan Kurak
Subject:	Comments to NJTPA on the NJDOT RT 29 rockfall mitigation project in Kingwood Twp., Hunterdon County
Date:	Wednesday, August 4, 2021 4:35:16 PM

Tom Coenen and Dan Kurak 50 Bridge 4 Pipersville, PA 18947

I respectfully request the NJTPA pause funding of the Rt 29 Rockfall Mitigation project in Kingwood Twp. and the other active projects in Hunterdon and Warren counties and require NJDOT to return to the Concept Development Phase and to more meaningfully involve local elected officials, and other stakeholders in evaluating the best and least destructive options to reasonably minimize any real rockfall risks in these areas. And to assure that thorough and adequate environmental, historical and archeological impact studies are conducted by qualified independent professionals.

Respectfully yours,

Tom Coenen and Dan Kurak

Dr. James Wells, D.Min., NHA. COStJ. 215 Tumble Idell Road Frenchtown, NJ 08825 (732) 299-2000 direct cell & txt drjwells@earthlink.net

RE: Project 11413B, Rt 29 Rockfall Mitigation, Kingwood Township

I favor a pause in funding as well as the elimination of the above referenced project as conceptually developed at this point. The Concept Development Phase has not met the standards of the 2050 Plan. Locally elected officials, stakeholders and property owners have not received adequate communication, much less been involved in a collaborative process. In addition, environmental, historical and archeological investigations have been lacking and resulted in faulty concept development; as we have understood the project after extensive efforts to obtain a handful of documents from NJDOT.

This project is grounded in the value of "public safety," but the comparative safety concerns about rockfall are insignificant to the safety concerns addressed in Plan2050. Public peril from rockfall in Kingwood Township along Route 29 is akin to the peril from lightning strikes. There is no record of injuries or deaths from falling rock (although it "could" happen). Injury and death does occur from vehicular encounters with bicycles, deer and pedestrians as well as tree fall.

The high cost of this project specifically relates to the planners' choosing the most environmentally disrupting plan, requiring large-scale rock and soil removal, significant metal work and large-scale shotcrete application to what is defined as a "scenic" highway. The decision to go forward with the most drastic plan seems capricious because it has not been based on adequate public or professional input. There are many other ways to attenuate a future concern about rockfall. Furthermore, the drastic nature of this plan aesthetically changes the appearance of the Delaware River basin in Kingwood from a scenic wilderness for refreshment, hiking and water sports, to an environment that will upon completion be more akin to a strip mining operation.

This project is wasteful public spending when so much else must be done to address the genuine needs for safety and quality of life improvement so masterfully expressed in Plan2050. As a retired health care CEO, I know waste when I see it as well as patient disillusionment that results from profligacy of those with status and resources. This is no time to create additional evidence for the American people to lose confidence in their government. This project seems to provide just such evidence.

Please reconsider the wisdom of this project and address safety needs far more prevalent than these.

Hi Ted,

Please add our change.org petition with 3484 signatures to our comment on the Warren and Hunterdon County Rockfall Projects in the draft TIP

Thank you, Tara

Enjoy the day! Tara Mezzanotte Founding Member I-80 Rockfall Fence and Safety Concerns at the Delaware Water Gap Coalition Facebook: I80DWGCoalition 908-656-4603

Mission: Our group is designed to educate and assist those concerned with finding information regarding local community efforts to 1) help the NJDOT address the current known safety issues of the S-curve on Route 80 at the Delaware Water Gap, 2) ensure any construction in this area respects the natural beauty, historical and recreational significance of Mount Tammany, and 3) keeps traffic flowing during construction.

We are not contesting that mitigation may be required in the project area. We are contesting that the proposed plan is rational, effective, or considerate of the harms that will result to our local citizens and environment.





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Add Personal note here (Optional):

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