

## RESPONSE TO COMMENTS

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Date: June 21, 2022

To: Colleen Nicoulin, AICP, and Stephan Harris  
River to Sea TPO

From: Travis Hills, PE, RSP<sub>1</sub>

Project: 2022 Congestion Management Process

Subject: Draft Report Response to Comments

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This document responds to comments provided by various agencies in May/June 2022 for the 2022 Congestion Management Process Draft Report. These comments will be addressed (as applicable) in the Final CMP Report which will be complete by June 30, 2022.

### Comments from Stephan Harris – River to Sea TPO

1. Include page numbers on all pages.

*Response: The only pages that do not have page numbers are the Cover Page and the figures. Both the Cover Page and the figures were created outside of Microsoft Word thus the reason page numbers were not originally included. Once the report is revised and page numbers are set, page numbers will be added to each of the figures. A page number will not be included on the Cover Page.*

2. Figure 8 – Votran fixed-routes are not current. Use routes dated after June 2021. Also label the flex routes in New Smyrna Beach.

*Response: The Votran fixed routes will be updated for the current routes. Flex Routes 42, 43, and 44 will be labeled as an area on the figure.*

3. Figure 9 – I'm not aware of a funded trail along SR A1A in Flagler Beach. I'm not aware of a funded trail along SR 40 west of US 17.

*Response: These two trails will be removed from the figure.*

4. Figure 48 – Some of the Votran fixed-routes, such as US 17 leading to Pierson, no longer exist.

*Response: The Votran fixed routes will be updated for the current routes in the figure.*

5. Section 6.7.3 – Add PTASP performance targets to this section.

*Response: The Votran PTASP performance targets have been added as a new Section 6.7.3.5. Flagler County Transit does not have a PTASP, and this will be noted in the report.*

6. Table 20 – Update to “Encourage Carsharing/Vanpooling” under Transportation Demand Management. Add “raised barriers, such as zippers, to bicycle lanes” to the Ped/Bike Infrastructure section. Add “Update Transportation Impact Analysis (TIA) Guidelines for transit” to the Transit Operational Improvements section.

*Response: These edits have been made to Table 20.*

### Comments from Carmen Rosamonda – City Manager at City of DeBary

7. Incident Congestion Management Strategy –

Due to the plan’s high level view, I believe it is unable to guide leadership to truly and timely resolve traffic problems associated with congestion related to incidents. I believe this Board needs to institute an Incident Congestion Management Strategy for designated problem areas and certain segments of roadway. It is well documented that Interstate 4, between mile marker 104 and 108 is one of the highest incident prone areas in the entire Interstate 4 corridor. Even though, FDOT recognizes this area as a problem, there is no process in place to actually manage and resolve congestion and safety concerns occurring in local communities resulting from these incidents. I believe the River to Sea TPO Board needs to establish this process and widen its scope to include not only for I-4 incident congestion but also the surrounding impacted areas.

For example, for the last 3 years, I have been soliciting federal, state and local leaders to take action on the I-4 incident/accident prone area between mile marker 104-108. When incidents occur, I-4 traffic gets directed to inadequate local roads and neighborhoods. Dirksen Road is a county road connecting two federal highways, I-4 and Highway 17-92. It is the last exit before two federal highways cross the St. Johns River at the same location.

When incidents occur, frustrated drivers once doing 70 mph, use Dirksen Drive (2-lane road) as their alternative route to get to Highway 17-92. Once Dirksen Drive backs up, drivers begin to cut through local neighborhood roads with 25 mph speed limits to get to Highway 17-92. Our families and children are at risk without notice.

Why has this problem existed for more than two decades with no resolution? It is because the CMP is narrowly focused to just I-4 roadway. There is no consistent, cyclical process to address these problems and funnel much needed safety dollars toward local communities impacted by FDOT incident congestion.

Just recently, FDOT, Volusia County and City of DeBary held their first task force meeting to deal with this issue. Unfortunately, without a structured, consistent strategy in the CMP, these ad hoc task forces are hard to develop and usually produce marginal results.

*Response: The CMP is intended to serve as a resource that provides information for local decision makers to plan for a safe and effective transportation system for all road users. Through tying the Connect 2045 LRTP goals and objectives to data-driven performance measures, the R2CTPO can monitor system performance and identify problem areas in Volusia/Flagler Counties. Rather than identify specific congestion management projects, the CMP's purpose is to provide a toolbox of actions and strategies the R2CTPO and partner agencies can refer to when addressing congestion management issues.*

*The R2CTPO Unified Planning Work Program (UPWP) supports the creation of Regional Planning Subarea Studies to address issues like the one you have raised. As indicated in your comment a task force has already been established with FDOT, Volusia County and the City of DeBary to address the congestion issue. Based on the findings from this task force, the congestion management strategies identified in Section 7 of the CMP Report could be recommended and programmed to address the issues you have raised. Additionally, an "Incident Congestion Management" strategy will also be added to Section 7 of the CMP report.*

#### 8. Incremental Infrastructure Improvement Strategy –

The leading cause of congestion is traffic stoppage. The number 1 cause is inadequate merging lanes which cause congestion on a consistent basis. For more than a decade, the eastbound I-4 merging lane at mile marker 104 is too short, uphill and on a bridge. Every weekday in the late afternoon, traffic backs up 3-5 miles. Traffic moves flows smoothly and consistently before and after this traffic jam every afternoon and they are the same number of traffic lanes. For the last ten years, the business and residential growth in north Seminole County are adding more and more eastbound afternoon traffic on Interstate 4. This congestion causes drivers to exit the Interstate and come through DeBary, impacting our local roads and residents. It appears that we are going to wait until Beyond the Ultimate to fix this problem. The Beyond the Ultimate project is not yet funded or engineered and projected completion may not be until 2030 or 2035. Ultimately, since the diagnosis of the problem ten years ago, do drivers have to wait nearly 20 years for relief?

This is why I recommend INCREMENTAL INFRASTRUCTURE IMPROVEMENT STRATEGY that can focus on these smaller problems, especially when they are aligned with the future vision and larger project. Extending the I-4 eastbound onramp at exit 104 is aligned with the Beyond the Ultimate project. Segmenting the project to target specific problem areas improves the chances for funding, accelerates problem resolution and driver satisfaction and has a lesser impact on local roads and communities.

For example, in January 2022, the City of DeBary added an additional deputy dedicated to traffic enforcement. For the last 5 months, Volusia Sheriff's Office has written 1377 citations, 62% were non-DeBary residents. This is a prime example of the impacts congestion has on local communities.

*Response: The CMP, and R2CTPO general planning practices, support incremental infrastructure improvements (also known as short, mid, and long term project implementation). A short write up will be added to the CMP Report noting this, and a strategy will be added in Section 7 discussing the incremental improvement approach.*

*The "Implement I-4 Beyond the Ultimate (BtU) Managed Lanes" strategy will also be updated to note support for incremental improvements (like extending merge lanes or interim interchange improvements) that may occur prior to BtU implementation.*

### Comments from Volusia County

9. Overall, the report was thorough and very technical, which unfortunately made it hard for the average citizen (CAC), planner/city development staff (TCC) or elected official (TPO Board) to comprehend. Please remember the audience level that will be reading the report and the message you want to convey. In the Executive Summary, Section 1.1, Figure 1 could have easily been modified to add to columns – (1) Is there sufficient data to measure the PM (as opposed to referring to Appendix A) and (2) If measured, was goal achieved (Illustrated in Section 6 – way too far in the backend of the report). A simple green checkmark vs red cross would suffice to illustrate where the R2CTPO measures up.

*Response: The report will be reviewed for technical language and may be revised where appropriate.*

*The goal of Figure 1 is to provide an overview of the Goals/Objectives/Performance Measures, not to dive into the details on which performance measures were assessed. This review is primarily discussed throughout Section 6 because there are nuances with the data analyzed, especially if a specific performance measure was not being assessed.*

*For this CMP update, a "was the goal achieved" metric for each of performance measures was not established. This CMP was a major update from previous versions so the primary goal of this CMP was to establish the performance measures to be assessed and how they would be assessed. Some performance measures only have one year of data analyzed so there is no baseline for comparison. This is something that should be added to future CMPs now that performance measures have been established.*

10. Very good use of numerous tables & charts to illustrate concepts.

*Response: Thank you!*

11. Extremely good use of numerous GIS maps throughout report; however, really need to use more discretion in editing since a lot of the colors bleed into a fuzzy mess, which leads the audience into wondering what the main message is that the GIS maps are trying to illustrate. You want the maps to “pop” out areas/trends to convey the message. Showing all the data is not necessary (e.g., for the lower range values just showing the network base color would suffice). You also want the value ranges normalized for the audience (e.g., 0 to 5, versus 0.25 to 4.88). This was especially prevalent in Section 6 figures. In the urban areas, really need to consider using “Insets”. Advisory – be careful of using “yellow” color on blue background since not enough color contrast.

*Response: For the fuzzy maps, this may have been a printer/PDF reader error, or some resolution was lost when a "small" version PDF was created for distribution. The high resolution PDFs appear clearer and will be utilized for the final report submittal.*

*The figures will be reviewed and coloring adjusted for the lower range values accordingly.*

*For the rounding comment, the only figures where this type of rounding is found are the Truck Travel Time Reliability figures (2 figures total). These figures and the calculations to obtain the values will be reviewed to see if the legend numbers can be rounded.*

*Insets will be considered where appropriate.*

12. Executive Summary and Overview: General Observation: The Congestion Management Process seems to be more of a report, resource, or guide rather than a "Process," Please better explain how the report's information will be used in the prioritization process. Or better explain why this is called a process. Is it actually part of a process?

*Response: The overall Congestion Management Process is shown in Figure 2. There are a few Actions that are outside of the actual CMP report, but the goal of the CMP Report is to document how the different Actions are being performed by the R2CTPO. Throughout the CMP Report, the different Actions are referenced as they relate back to the entire "Process". This will be further clarified in the report.*

13. General Observation: The report focuses on FHWA, state and county roadway with little to no city roadway monitoring. It seems to put the pressure on the state and counties to apply corrective measures; however, the main culprit of the growing congestion and safety issues on are system are attributed to the imbalance of local jurisdiction-approved development/growth and existing/planned roadway infrastructure plan. Local jurisdictions are approving urban and suburban development densities and intensities and requiring little to no on-site or local roadway planning from developers seeking those entitlements.

*Response: Specific to Volusia County, the CMP focused on roadways where traffic counts were readily available, which ended up being primarily the State and County roadway network. If traffic counts are collected on city/local roadways in the future, these roadways can be added to the analysis network as part of future updates.*

14. Figures 1 and 6 (same table but used in separate sections):
- a. Do the PM column background colors mean anything (blue & green) or is it to illustrate subsections to make them easier to read? If the latter, pls disregard comment.
  - b. The overview on page 1 states that the TPO can use the data to prioritize projects. Goal 1 (Develop and maintain a balanced and efficient multimodal transportation system): The locals are making decisions with regard to how multimodal an area's transportation system will be, so how will the process apply to the locals? Will the process reward those jurisdictions that plan for mobility vs. those that just approve whatever the developers/landowners want? Some cities go the extra mile to plan supportive collector and local streets to facilitate good circulation, travel options, and reduced impacts on thoroughfares. Some do not.
  - c. Goal 2 (Support the economic development and growth of the TPO area and region): How will the process reward those jurisdictions that strive to protect the thoroughfares intended to move freight and goods? Arterial capacity quickly disappears when locals fail to plan needed local and collector roads to support development intensities and densities. The current system of prioritization seems to reward those areas with the greatest amount of congestion. However, when those locations occur in areas where community planning is lacking, the current system fails by rewarding those same jurisdictions with capacity projects.
  - d. Goals 3, 4, and 5: Again, if the CMP impacts project prioritization, then the jurisdictions that implement Goal 3 (Enhance and expand transportation connectivity and choice for all users), Goal 4 (Eliminate or reduce crash-related fatalities and serious injuries (safety) and improve security throughout the transportation network), and Goal 5 (Promote livability by providing, protecting and enhancing social, cultural, physical and natural environmental places) should be rewarded – not inadvertently penalized.

*Response: For Part A, the colors are there to illustrate subsections.*

*For Parts B through D, the CMP performance measure data could be used in criteria for prioritizing projects in the LRTP, TIP, and/or List of Priority Projects, which will be clarified in the report. Specific ways the CMP could be incorporated into regional prioritization may be addressed as part of the LRTP, TIP, and/or List of Priority Projects during their next update cycle.*

15. Table 2 & 3, pp's 5-6: How do these R2CTPO Key PM's compare to other peer TPO's? Are we doing better, same, or worse. That's what the elected officials need to know.

- a. Table 2, page 5: DEO determined that the LOS on county and state roads within a local jurisdiction is that local jurisdiction's responsibility since they make land use and development decisions that impact LOS the most. If Table 2 were broken out by jurisdiction, perhaps it would gain local jurisdiction attention. Otherwise, most won't look at this as their issue since they don't own the congested roads.
- b. Table 3, page 6: Again, consider breaking out Table 3 by jurisdiction especially considering the strong correlation between elevated risky driver behavior and crashes and low law enforcement traffic patrol presence.

*Response: This CMP did not analyze the R2CTPO performance measures vs peer TPO performance measures, but this can be incorporated into future CMPs if desired.*

*For Part A, Table 2 will be updated to reflect congestion for each jurisdiction.*

*For Part B, the crash rates data is typically reported at the County/TPO level, not at the local jurisdiction level. The safety data in Section 6.4 does break down the high crash corridors in map format so the local jurisdiction can see if any high crash corridors are located in their area. For future CMPs, the crash rates can be analyzed at the local jurisdiction level.*

16. Figure 3, page 7: Consider modifying or adding the following categories:
  - a. Development (or add to Policy & Land Use):
    - i. Ensure future land use and zoning amendments applications have sufficient transportation capacity prior to adopting. If they don't, require developers to provide an improvement(s) in exchange for the development entitlements being sought. Delaying this discussion to the site plan stage enables the developer to obtain concurrency through the routine method that should only be applicable toward those properties that already have development entitlements.
    - ii. Ensure adopted densities and intensities have the necessary local road system from which primary access should be prioritized. This goes beyond analyzing the system of state and county thoroughfare capacities. Please see the graphic at the bottom.

*Response: These will be added as strategies in the Policy & Land Use category.*

17. Figure 3, page 7: Consider modifying or adding the following categories:
  - a. Law Enforcement:
    - i. Ensure law enforcement resources increase with population growth.
    - ii. Prioritize roadway patrol and implementation of traffic safety laws.

*Response: The first strategy is outside the bounds of the CMP and will not be added. The second strategy will be added in the Arterial and Freeway Management category.*

18. Page 8, 2.1

- a. Paragraph 2, throughout the report, it recommends “bi-annual update”, how was this time frame derived since a lot of the data is produced annually. For example, previous year FDOT Traffic AADT counts come out around June of each year. Also refer to Page 11, 2.4 – Are there any requirements on from the fed’s and state on how often the CPM should be updated? R2CTPO staff should bring this up for discussion at the MPOAC so that there is a best practice consistent.
- b. Paragraph 3: We can use the data in the current CMP, but it will likely not change anything or have a positive influence since those responsible for producing congestion do not have facilities and systems that are being analyzed. Prioritization should include rewarding local jurisdictions that plan for transportation.

*Response: For Part A, the FHWA CMP Guidebook notes “Although the CMP does not have an update cycle established by federal regulations, both the four-year certification review cycle and the four- or five-year MTP update cycle for each TMA provide a baseline for a re-evaluation/update cycle in the absence of an identified requirement. The CMP must, at minimum, be updated often enough to provide relevant, recent information as an input to each MTP update.” Thus, the R2CTPO is proposing biannual updates of the CMP so there are up to two updates prior to each LRTP update cycle. This proposal does not preclude an annual update if one is needed.*

*For Part B, see previous response on prioritization.*

19. 4.1, page 16: Why aren't we including the cities? The larger ones especially should have a number of important collector roadways.
  - a. Figure 7: Remove “local” street not eligible for federal funding. Only include collectors, arterials and interstates. This should be done on all maps throughout the report.
  - b. Figure 8: DeLand Amtrak Station is also a future SunRail Station. Recommend using orange color for “SunRail” and use dash circle line for future station.
  - c. Figure 9: Pls update Trail Map (2017 data) with the Volusia County website, especially our Cross Florida Trail & River-to-Sea Trail. Map shows funded trails that are open to the public. Pls verify SR 415 trail from St Johns River north to Osteen. This was installed and opened to the public as part of the SR 415 widening project. Portions are coded as “bike lane”.
  - d. Figure 10: Advisory – May want to show the overall communication network since Volusia County uses a lot of 4G and point-to-point radio to control & monitor our traffic signal assets (i.e., signal controllers or CCTVs), especially our remote locations. In Volusia, we have communication access to 279 traffic signals (out of total of 345) or 81%.
  - e. Figure 11 (2018 data): Pls update the CCTV & signal locations. If you have our Traffic Inventory spreadsheet, it lists where all 81 local CCTV’s are located. We can also provide a metadata GIS file if you would prefer that.
  - f. Figure 12 & 45 (Evacuation Routes): Pls revise the Source to read “ECFRPC Planning Evacuation Routes1” Footnote 1: Pls refer to the appropriate County Comprehensive Plan,

Chapter 2-Transportation Element, Evacuation Routes for the “officially” designated routes. {NOTE: We did follow-up with our GIS staff and the metadata file does reference the Regional Planning Agency. We are scheduling a meeting to correct this issue. Thank you for bringing this to our attention since hurricane routes impact economic development & roadway design criteria.]

*Response: See previous response in regard to why collector roadways in cities were not included in the analysis. It is important to note that local roadways not having a Federal Functional Classification cannot have federal money applied for any potential projects. For Part A, the Volusia County count network will be reviewed for local roadways that may need to be removed.*

*Parts B, C, E, and F will be reviewed and revised as necessary in the report.*

*Part D will be addressed in a future CMP update.*

20. 5.1, page 23: How can we also make the cities responsible in our regional issues? The performance measures seem to put the burden on Federal, state and counties. Consider adding other related performance measures such as: Number of Collector Roads built by developers in the last 5 years, Number of gated subdivisions approved, Number of planned local jurisdiction collector road lane miles in comprehensive plan, etc.

*Response: The Working Group for the CMP update included representation from city, county, and state agencies within the TPO planning area. It is recommended that continued communication take place between all local jurisdictions regarding congestion management so each jurisdiction is aware of the congestion issues and their impacts on performance measures.*

21. 6.1.2, page 25: Include strategies for the cities to reduce VMT. (For Example: Design projects so they retain traffic on-site or require land use patterns that reduce trip lengths.)

*Response: The strategies discussed in Section 7 could also be utilized by the cities to help with congestion management.*

22. Regarding congestion tracking, consider documenting how fast some roadways have failed, signifying that the local jurisdictions need to develop and implement CMP GOPs and strategies. Consider showing this through reviewing the difference between the number of congested roadway lane miles occurring between the following:

2000-2019

2005-2019

2010-2019

2015-2019

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*Response: This type of analysis may be incorporated into a future CMP update.*

23. Table 8, page 29: Add a column that shows the percentage of over-capacity centerline miles. For example, if 3.3 centerline miles are congested of the total 6.6 within that jurisdiction, then 50% would be congested.

*Response: Table 8 will be updated to add this information.*

24. Figure 16, page 30: Advisory – Relocate “SR 5A” shield since it hides the “Hand Ave” congested segment.

*Response: Figure 16 will be updated to relocate the roadway label.*

25. Page 31:

- a. The report may want to discuss how some congestion cannot be corrected. For example, SR 44 in New Smyrna Beach will always have beach traffic congestion as long as the city maintains its attractive beach amenities, events, and business/entertainment attractions.
- b. Last Paragraph: How does expanded fiber network allow for more data collection? May want to reference expanded “communication” network.

*Response: Both parts of this comment will be updated in the report.*

26. Figure 22 (Peak Season): Advisory – Why “April”? Typically, March is our peak season due to snow birds still here (ie., northerner’s), Bike Week & Spring Break all occurring.

*Response: The reliability data will be reviewed to confirm if the peak season is March or April.*

27. Page 39, 2nd paragraph, last sentence (TSP): Revise to read “... so as buses and more routes become equipped...” since a lot of the Volusia County local jurisdictions have installed Fire Pre-emption that is compatible with TSP. These jurisdictions include Deltona, Ormond Beach, Port Orange, NSB, Orange City, Debary. In addition, some of these projects were funded by the R2CTPO XU set aside funds.

*Response: The report will be revised based on this comment.*

28. Page 39, Truck Reliability: The local jurisdictions need to be part of the Truck Reliability Factors and performance measures. They are making the land use and development decisions that are impacting roads needed for trucks. The way the report is written, they are not held accountable because they don't own those roads. Perhaps the CMP should involve them.

*Response: The Working Group for the CMP update included representation from city, county and state agencies within the TPO planning area and input was provided regarding Freight*

*specific strategies for the CMP report. It is recommended that continued communication take place between all local jurisdictions regarding land use and development approvals and the impacts to congestion management.*

29. Figure 26: Legend: The Orange 2.89-10.12 range should be broken out more to illustrate any extreme TTR locations.

*Response: The analysis will be reviewed to potentially identify additional break points in the data and Figure 26 may be updated accordingly.*

30. Page 43, 6.3 Multimodal Travel Modes: Consider expanding this section to discuss the importance of development design/layout that encourages transit use. This is a local jurisdiction planning and zoning issue. TOD is rarely developed, yet we strive to retain ridership and provide connections between jobs and under-served communities.

*Response: A strategy will be added to Section 7 to discuss development design/layout that encourages transit use.*

31. Various "Total Number" maps like Figures 33 and 34: What is the rate? We expect high numbers of crashes on high volume roadways, so Figure 33 (for example) doesn't tell us much. The number of annual crashes per AADT would be more informative.

*Response: This type of analysis may be incorporated into a future CMP update.*

32. Figures 33-36: Refer to previous Overview comment regarding normalizing legend #'s and just highlighting what's important to convey the message "How are we doing?" The lower values should just be the normal color of the transportation network.

*Response: The figures will be reviewed and updated accordingly.*

33. Figures 37-44: Recommend showing the "urban" and "rural" boundaries within the R2CTPO Boundary to further convey the safety message, especially since Fed's & State have rural safety funding available to local agencies. This would also make the maps "pop" showing the hot spots. Most persons would anticipate more crashes in the urban area since more traffic & higher risk.

*Response: The figures will be reviewed and the urban/rural boundaries may be updated on figures where appropriate.*

34. Page 62, Evacuation Routes: Pls refer to previous comment and then revise bullets, which reflect congested roads in jurisdictions that don't have evacuation routes (ie., DeLand & Volusia County).

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*Response: The CMP report will be revised in accordance with the two comments regarding evacuation routes.*

35. Page 64, Promote Livability: The local jurisdictions have the greatest ability to impact and promote livability, so they need to be brought into the discussion. Consider breaking out Figure 46 by jurisdiction.

*Response: Cities were invited to participate in the Working Group for the CMP update. Figure 46 will be updated to show the EV charging station breakdown by jurisdiction as part of a future CMP update.*

36. Figure 48: Pls have Votran verify “local routes/trolley” since we have none in Volusia to my knowledge unless this reflects “flex routes”.

*Response: This figure will be updated to reflect Flex Routes 42, 43, and 44.*

37. Page 70, Performance Measures –

- a. Safety: How does the state's efforts correlate with the reduced FHP presence patrolling our interstates? Dangerous and disrespectful driving behavior occurs more frequently in areas where little FHP presence is seen.
- b. Safety PM's: Why was the FDOT Vision Zero used as opposed to the R2CTPO 2% reduction?

*Response: For Part A, the R2CTPO will coordinate with FDOT for an answer to this question. For Part B, the safety performance measures will be revised to reference R2CTPO's two percent reduction.*

38. Page 73, 6.7.3.4, bullets at the bottom: 1st bullet should spell out ULB; whereas, 2nd bullet shouldn't.

*Response: This will be revised in the report.*

39. Page 74, Congestion Management Strategies: General Observation: The report checks off the What, When, and Where portions of the congestion issue, but the How and Why are still unclear. How do we get the decision makers involved so they actually apply the strategies? And why is congestion happening? Efforts are needed to determine what is going on in a particular areas.

*Response: This version of the CMP was intended as a major update to previous versions, specifically regarding performance measures and the data analyzed. The CMP report is not intended to address every potential issue nor be a standalone document, but to help all interested parties re-engage in conversations on congestion management. The R2CTPO will be identifying opportunities to engage decision makers to address congestion issues more regularly moving forward.*

40. Table 20, Policy and Land Use: Consider adding 2: Encourage developers to develop more TND, TOD in mixed use developments. Also, require jurisdictions to construct a system of local and collector roadways to support their density and intensity increases. All access cannot be on the state and county arterials. These are just a few, but this section should be expanded.

*Response: These strategies will be added to Table 20.*

41. Table 21: Freight: Add Protection of the state and county thoroughfare system. Stop local jurisdictions from approving projects that only connect to the adjacent thoroughfare because it's the only existing roadway. Plan a local roadway network around that thoroughfare road.

*Response: The Working Group for the CMP update included representation from city, county, and state agencies within the TPO planning area and input was provided regarding Freight specific strategies for the CMP report. It is recommended that continued communication take place between all local jurisdictions regarding connectivity, developing local roadway networks, and the impacts to congestion management.*

42. Page 80, Table 22: Capacity: Consider adding:
- a. Add new local and collector roadways
  - b. Prioritize access on local and collector roadways - observe the roadway system hierarchy.

*Response: These strategies will be added to Table 22 but it is important to note that local roadways not having a Federal Functional Classification cannot have federal money applied for any potential projects.*

43. Page 80: The report lacks discussion of the importance of community planning and acknowledgment that poor planning impacts all of us. The negative impacts of poor planning don't stop at the municipal boundary of the local government implementing poor planning.

*Response: The CMP and all R2CTPO planning documents support planning "best practices". The R2CTPO will be coordinating with local jurisdictions outside of this CMP to engage in discussions regarding these "best practices" and ways good planning can mitigate congestion while improving safety.*

44. Page 82, Biannual Performance Monitoring Report: Is requiring biannual updates practical when traffic counts are released once per year?

*Response: The timing of a biannual performance monitoring report was selected to coincide with the biannual CMP update. While biannual is proposed, this does not preclude an annual performance measure update if one is needed. The CMP report will be updated to clarify this.*

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45. Most of the troublesome spots that we know about are show in their report. One thing that I noticed was the report said there was a need for a TMC. We now have functioning TMC at our new county facility along US 92 & Daytona Beach still has their TMC off Bellevue Rd. Maybe our long term plan should include expanding TMC staff to cover peak, off peak and weekend traffic. The other observation is the need for additional fiber. It seems like any of our future County roadway projects should be required to install fiber for future connectivity.

*Response: The recommendations to expand TMC staff and add fiber to the existing network will be added in Section 7 of the CMP report.*