

June 30, 2026

Michael Carroll, P.E.Secretary of Transportation
Pennsylvania Department of Transportation
400 North Street
Harrisburg, Pennsylvania 17120**RE:** Public Comment on the Draft FFY 2027–2030 Statewide Transportation Improvement Program (STIP)

Dear Secretary Carroll:

5th Square Advocacy is a Philadelphia-based 501(c)4 organization dedicated to grassroots advocacy for a more affordable, safe, accessible, sustainable, and equitable city and region. We are joined in these comments by Transit Forward Philadelphia, a 501(c)3 organization committed to building public support for a stronger, better funded regional transit network. Together, we submit these comments during the public comment period on the Draft FFY 2027–2030 Statewide Transportation Improvement Program. Our comments draw on a review of the STIP Executive Summary, the Draft DVRPC FFY 2027 Transportation Improvement Program for the five-county southeastern Pennsylvania region, and an analysis of all 357 projects in that regional TIP.

The \$29.4 billion STIP — \$17 billion for highways and bridges, \$12.4 billion for transit — is the most consequential transportation investment document Pennsylvania produces. We believe the current draft, while containing many investments we support, does not yet reflect the urgency of the transit crisis facing this region, nor does it adequately restrain highway expansion that induces congestion rather than reducing it. We urge PennDOT to use this program cycle to make bolder, more people-centered choices.

I. Flex More Highway Funds to Accelerate Transit

The 2027 STIP continues a \$25 million per year cap on federal highway funds flexed to transit — a figure that has remained unchanged for years while SEPTA's state of good repair capital backlog has grown to over \$10 billion. The DVRPC TIP does include a CMAQ Flex for SEPTA Projects of Significance line item (\$341.8 million over the plan period) and a Transit Flex – SEPTA line item (\$205 million), which we support. But the structural ceiling on annual flex transfers is far too low given the scale of regional need.

Federal law permits states to transfer a broad range of Surface Transportation Block Grant Program and National Highway Performance Program funds to transit uses. Pennsylvania should expand this practice significantly. Every dollar invested in transit reduces road wear, lowers crash rates, cuts emissions, and returns over \$4 billion in economic impact annually to the Commonwealth according to SEPTA. We call on

PennDOT to increase annual highway-to-transit flex fund transfers by at least 50% and prioritize the acceleration of SEPTA's state-of-good-repair backlog in the final STIP.

II. I-95 Through South Philadelphia: Study Burial or Removal — Not Expansion

The DVRPC TIP contains over \$1.7 billion in I-95 projects through Philadelphia, many of which have been flagged for close scrutiny given the risk that reconstruction work could expand vehicle capacity, footprint, or throughput in communities that have already borne decades of harm from this highway. As planning work on PennDOT 95Revive's Central/South Philadelphia section continues, We strongly oppose any expansion of I-95 lane capacity between Center City and South Philadelphia.

A key argument made for maintaining and expanding I-95 through South Philadelphia is freight movement — specifically, north-south truck traffic and cargo generated by the Port of Philadelphia. 5th Square Advocacy rejects the premise that this freight demand requires expanding I-95 through dense urban neighborhoods. North-south freight traffic on the I-95 corridor is better served by routing trucks to I-295, which runs parallel to I-95 through New Jersey and reconnects to the interstate system north and south of Philadelphia without threading through the city's most congested and community-impacted segments. Port of Philadelphia freight, meanwhile, should be evaluated for diversion to rail freight connections and the existing highway network east of the port, rather than funneling container trucks through South Philadelphia residential streets and onto I-95. PennDOT should conduct a freight routing alternatives analysis as part of any I-95 corridor study, with I-295 and intermodal rail as the preferred alternatives to urban interstate expansion.

Together we call on PennDOT to formally initiate a study of transformative alternatives for the I-95 corridor between Center City and South Philadelphia, ranging from burial below grade to full highway removal from I-676 to Broad Street. These are not radical ideas: Boston demonstrated burial is achievable, and highway removal projects in cities in both the USA and around the world including Seoul, Milwaukee, and San Francisco have been transformative for urban neighborhoods. Philadelphia deserves the same serious study and consideration. Any project in this corridor must include enforceable commitments to no net lane additions, mandatory multimodal improvements including transit access and protected cycling, and environmental justice analysis of impacts on adjacent communities.

III. Transit Projects We Support

The following projects in the DVRPC TIP represent critical investments that 5th Square Advocacy and Transit Forward Philadelphia endorses and urges PennDOT and DVRPC to protect, fund fully, and accelerate wherever possible:

- **Trolley Modernization Program (MPMS #123961) — \$2.45 billion.** The single largest transit investment in the regional TIP and a top coalition priority. SEPTA's legacy trolley network serves dense, transit-dependent neighborhoods in West Philadelphia, Southwest Philadelphia, parts of Delaware County, and North Philadelphia. Modernization of bridges, signals, power, and track — and eventual full-low-floor vehicle replacement — is essential to preserving and expanding this network.
- **Regional Rail Silverliner IV Vehicle Replacement & Infrastructure (MPMS #123966) — \$2.02 billion.** The Silverliner IV fleet is well past its useful life and is the primary driver of Regional Rail unreliability. Replacement is a prerequisite for Reimagine Regional Rail and every frequency improvement SEPTA has promised riders.
- **Market-Frankford Line Vehicle & Infrastructure (MPMS #123964) — \$1.12 billion.** The Market-Frankford Line is SEPTA's highest-ridership rapid transit line, serving the spine of Philadelphia from Upper Darby through Frankford. Modernizing rolling stock and infrastructure is foundational to improving service for hundreds of thousands of daily riders.
- **Communications, Signals & Technology Improvements (MPMS #102571) — \$1.51 billion.** Modern communications and signal systems are what enable higher frequencies, safer operations, and better real-time information for riders. This investment underpins every service improvement SEPTA can offer.
- **SEPTA Bus Purchase Program (MPMS #90512) — \$703.9 million.** Bus is SEPTA's most-used mode. Fleet replacement — including electrification — directly improves reliability, air quality in bus-dependent neighborhoods, and rider experience for the region's most transit-dependent communities.
- **Mainline Schuylkill Bridges & Interlockings (MPMS #123969) — \$363.5 million.** The seven bridges between Suburban Station and 30th Street Station, built in 1929, carry every Regional Rail line through Center City. Their rehabilitation is not optional — failure here would cripple the entire network. This must be treated as emergency infrastructure.
- **CMAQ Flex for SEPTA Projects of Significance (MPMS #118015) — \$341.8 million.** This line item represents highway CMAQ funds being directed to SEPTA capital needs. We strongly support this transfer and call for it to be expanded in future program cycles.

- **Safe, Clean, and Secure Program (MPMS #121367) — \$340.5 million.** Rider safety and station conditions are core to transit ridership. We support sustained investment in this program.
- **Infrastructure Safety and Renewal Program (MPMS #90497) — \$842.5 million.** Systematic state-of-good-repair investment across the transit system is the foundation on which service reliability depends. This must be protected from any cuts.
- **Broad Street Line Vehicle & Infrastructure (MPMS #123965) — \$15 million (initial TIP entry; full program cost \$700M+).** The Broad Street Line serves dense North and South Philadelphia neighborhoods with high transit dependency. Vehicle replacement and infrastructure upgrades are critical for this corridor.
- **City Hall / 15th Street Stations Rehabilitation (MPMS #60335) — \$130.3 million.** These stations are among SEPTA's busiest and most critical interchange points. Rehabilitation improves accessibility and station condition for enormous daily ridership.
- **North Broad Bus-Subway Transfer Improvement Project (MPMS #122325) — \$625,000.** A targeted, high-impact project improving the connection between North Broad Street bus services and the Broad Street Line. 5th Square and Transit Forward Philadelphia have long advocated for seamless intermodal connections and supports full funding.
- **Downingtown Train Station Rehabilitation (MPMS #93586) — \$15.75 million.** Rehabilitating and improving Regional Rail stations expands the catchment area for transit and supports the Coatesville service restoration effort.
- **Villanova Intermodal Station (MPMS #15407) — \$45.6 million.** A true intermodal hub connecting Regional Rail, SEPTA buses, and the surrounding institution and community — the kind of multimodal investment we want to see more of throughout the region.
- **Ardmore Transportation Center (MPMS #73214) — \$7.3 million.** Ardmore's multimodal hub connecting Regional Rail, trolleys, and buses is a model for transit-oriented place-making. We support its continued investment.

IV. Safe Streets and Active Transportation Projects We Support

The following bike, pedestrian, Complete Streets, and Vision Zero projects represent exactly the investments that reduce car dependence, improve safety for vulnerable road users, and build toward a connected regional active transportation network. 5th Square Advocacy and Transit Forward Philadelphia endorses all of these and urges their protection and timely delivery:

- **Philadelphia Vision Zero Capital Plan Implementation (MPMS #81930) — \$39.8 million.** Vision Zero is a moral commitment to eliminating traffic deaths. This capital program funds physical infrastructure improvements on Philadelphia's High Injury Network and must be defended from any reductions. Specifically, we ask the neighborhood slow zones be prioritized for implementation.
- **Complete & Safe Streets Philadelphia: Vision Zero High Injury Network Corridors (MPMS #81936) — \$22.2 million.** Targeted investment on the corridors where the most serious crashes occur. We strongly support.
- **I-95 Central Access Philadelphia (CAP) / Waterfront Access (MPMS #106264) — \$61 million.** Reconnecting Philadelphia's waterfront to its neighborhoods by capping I-95 with public green space is exactly the kind of transformative investment that should inform a broader conversation about I-95's future in this city.
- **Spring Garden Connector (MPMS #118034) — \$58.6 million.** A critical missing link in Philadelphia's protected bike network connecting Fairmount and the waterfront. We urge full and timely delivery.
- **Transportation Alternatives – Urban (TAU) Line Item (MPMS #64984) — \$101.8 million.** This line item funds 34 newly awarded TASA projects totaling \$40.5 million that are not yet visible as standalone TIP entries. We urge DVRPC to provide project-level visibility for these awards rather than rolling them into the aggregate line item. Highlights include the East Coast Greenway in Bristol Township, Chester Valley Trail Connector via Exton Park, 48th Street Bus Boarding Islands, Hunting Park Ave Bike Gap Closure, Indego System Expansion, and the Tookany Creek Parkway Trail.
- **Wissahickon Avenue Safety: Hunting Park Ave to Clapier Street (MPMS #82168) — \$4.8 million.** A road diet combined with pedestrian safety improvements on a dangerous corridor in a historically underinvested neighborhood. A model for what safe streets investment should look like across the city.
- **Frankford Avenue Phase 3 Safety Improvements (MPMS #82164) — \$3.9 million.** Frankford Avenue serves dense neighborhoods in Northeast

Philadelphia with heavy foot traffic and significant crash history. We support continued investment in this corridor.

- **North Philadelphia School Zones RAISE 23 (MPMS #120993) — \$28.4 million.** Protecting children walking to school is a moral imperative. This investment in school zone safety in North Philadelphia communities is strongly supported.
- **Complete Streets Resurfacing Program (MPMS #63406) — \$600,000.** This program adds cycling infrastructure to roads being resurfaced — one of the most cost-effective opportunities to build out the regional bike network. The 18-segment pipeline includes buffered bike lanes on Almshouse Road, Bristol Oxford Valley Road, and Second Street Pike, among others. We support this program but urge PennDOT and DVRPC to eliminate sharrows as an acceptable treatment in the program's design standards. Research consistently shows sharrows provide no meaningful safety benefit for cyclists and create a false sense of protection. Every resurfacing project in this pipeline should be evaluated for physically separated or at minimum parking-protected bike lanes rather than sharrows, particularly on higher-speed or higher-volume roads. Resurfacing is the lowest-cost moment to install proper protected infrastructure, and that opportunity should not be wasted on ineffective markings.
- **Better Bus Stops – South 7th and 8th Streets (MPMS #81230) — \$1 million.** Bus stop quality is a basic rider dignity issue. We support this investment and want to see the Better Bus Stops program expanded throughout the city.
- **Woodland Avenue Trolley Portal Complete Streets Project (MPMS #118496) — \$1.24 million.** A complete streets treatment at a major trolley portal in West Philadelphia, improving safety for pedestrians, cyclists, and transit riders simultaneously.

V. Circuit Trails Network: Full Support

5th Square Advocacy and Transit Forward Philadelphia fully supports the following Circuit Trails investments and urges DVRPC and PennDOT to protect and advance all of the following projects. The Circuit Trails network is the backbone of regional active transportation, connecting communities across southeastern Pennsylvania to transit, employment, and open space.

We fully support the allocation of \$322,753,000 across the following 18 Circuit Trails projects in the southeastern Pennsylvania counties:

- **MPMS #105291 — The Circuit Line Item (\$322,753,000 total).** Umbrella funding supporting: Newtown Rail Trail Phase 3, Newtown Rail Trail Phase 4, Chester Creek Trail Phase 2, Parkside Cynwyd Trail, and Wissahickon Gateway Trail.

- **MPMS #81744 — Chester Valley Trail: P&T Phase 1.** West Whiteland Township, Chester County.
- **MPMS #81785 — Cross County Trail East: Section A.** Upper Dublin and Upper Moreland Townships, Montgomery County.
- **MPMS #82084 — Cross County Trail East: Section B.** Upper Moreland Township, Montgomery County.
- **MPMS #119841 — Cross County Trail Extension.** Plymouth and Whitemarsh Townships, Montgomery County.
- **MPMS #82083 — Cross County Trail: Wissahickon Trail to SEPTA's Fort Washington Station.** Whitemarsh Township, Montgomery County.
- **MPMS #79832 — North Delaware Riverfront Greenway, Section 3.** Philadelphia.
- **MPMS #66952 — PA 23/Valley Forge Road and North Gulph Road Relocation (2NG).** Upper Merion Township, Montgomery County.
- **MPMS #99668 — PA 291 Drainage Improvement.** Ridley Township, Delaware County.
- **MPMS #120298 — Schuylkill Banks: Bartram–Passyunk Phase 2.** Philadelphia.
- **MPMS #118038 — Spring Garden Connector.** Philadelphia.
- **MPMS #82069 — PA 291 Complete Streets: Irving Street to Ridley Creek.** Chester City, Delaware County.
- **MPMS #64778 — State Road Reconstruction.** Bristol Township, Bucks County.
- **MPMS #74827 — Delaware Canal Enhancement.** Yardley Borough, Bucks County.

We also fully support the prioritization and construction of the following projects that connect to the Circuit Trails network:

- **MPMS #103563 — I-95: Delaware Avenue Extension (BS5), \$175.4 million.** We support the trail connectivity component of this project. We separately call on PennDOT to confirm that the roadway scope does not expand general-purpose vehicle capacity along the waterfront.
- **MPMS #118030 — Newtown Trail.** Newtown Township, Delaware County.
- **MPMS #70230 — Bells Mill Road and Valley Green Road over Wissahickon Creek.** Philadelphia.
- **MPMS #110313 — Belmont Avenue Bridge over Schuylkill River.** Philadelphia.

- **MPMS #103521 — Reed Road over Whetstone Run (CB #36).** Marple Township, Delaware County.
- **MPMS #120281 — South Collegeville Road (PA 29) at Perkiomen Boulevard.** Upper Providence Township, Montgomery County.
- **MPMS #81294 — South Easton Road Township to Borough Connector Trail.** Doylestown Township, Bucks County.
- **MPMS #84258 — Pennsylvania Avenue Bridge over Delaware Canal.** Morrisville Borough, Bucks County.
- **MPMS #119977 — I-95, I-295, PA Turnpike Interchange Stage 3: Delaware River Bridge Replacement.** We call on DVRPC to update this project description to include the shared-use path in the Alternatives Analysis. A shared-use path crossing here would be a transformative regional connection and must be planned for from the outset.

5th Square Advocacy also makes the following programmatic requests:

- **Modal funding transparency.** DVRPC should develop a methodology to accurately categorize TIP funding by mode, enabling a clear tabulation of the full dollar amount allocated to regionally significant bicycle and pedestrian projects. The current TIP search tool tags projects by mode but does not support aggregate funding totals by mode — a gap that obscures the true level of active transportation investment and makes advocacy and accountability harder.
- **Circuit Trails map layer in the interactive TIP map.** DVRPC should add the Circuit Trails network as a project layer in the interactive online TIP map, enabling the public and planners to see how TIP investments relate to the regional trail network.

VI. Roadway Capacity Projects We Oppose

The following projects have been flagged by DVRPC itself as "Projects of Concern" for adding roadway capacity, or have been identified through our analysis as Roadway New Capacity investments that contradict the Commonwealth's stated goals of reducing congestion, improving air quality, and advancing environmental justice. Decades of research confirm that adding highway capacity induces additional vehicle travel and does not reduce congestion. 5th Square Advocacy opposes the following projects and calls for their removal from or descopeing within the STIP:

- **I-76 Flex Lanes: US 202 to I-476 (MPMS #116838), Montgomery County — \$283.5 million.** Despite the "flex lane" framing, this project converts shoulders to active travel lanes — a capacity expansion by another name. DVRPC-flagged Project of Concern. We oppose.

- **I-76 Flex Lane WB: US 1–Belmont Ave (MPMS #116839), Montgomery County — \$158.2 million.** Companion to #116838. Together these two I-76 flex lane projects add nearly \$442 million in effective highway capacity expansion to one of the region's most congested corridors, while SEPTA's Paoli/Thorndale and Norristown lines running parallel remain chronically underfunded. We oppose.
- **Belmont Road/Rock Hill Road Widening: I-76 Ramps to Rock Hill Road (MPMS #64795), Montgomery County — \$19.1 million.** Explicit widening in Lower Merion Township near I-76 ramps. We oppose.
- **7th Street On-Ramp to I-76W (MPMS #82183), Philadelphia — \$15 million.** A new or expanded I-76 on-ramp in Center City Philadelphia that will increase automobile throughput on the Schuylkill Expressway. In a city working toward Vision Zero and transit-first policies, adding freeway on-ramps is moving in the wrong direction. We oppose.

Conclusion

The FFY 2027–2030 STIP and the regional DVRPC TIP represent a multi-billion-dollar statement of values about how Pennsylvania moves people. 5th Square Advocacy and Transit Forward Philadelphia urges PennDOT to finalize a STIP that expands highway-to-transit flex fund transfers beyond the current \$25 million annual cap, protects and accelerates the full suite of SEPTA capital investments listed above, requires enforceable no-capacity-expansion commitments for all I-95 projects in Philadelphia, removes or descopes the roadway new capacity projects identified in Section VI, ensures project-level transparency for aggregated TIP line items including TASA awards, advances the full Circuit Trails investment program, and initiates a formal study of I-95 burial or removal in South Philadelphia as an alternative to perpetual highway reconstruction and expansion.

The economic case for these priorities is clear. Every dollar invested in public transit generates approximately five dollars in regional economic activity. A robust, reliable transit network reduces household transportation costs for the region's working families, lowers the cost of doing business by connecting workers to employers across county lines, and reduces the infrastructure maintenance burden that road congestion accelerates. Highway expansion projects, by contrast, generate induced demand — more vehicle miles traveled, more wear on roads and bridges, more congestion — and require continuous, expensive maintenance without generating equivalent economic return. The projects 5th Square Advocacy and Transit Forward Philadelphia support in this letter represent a smarter allocation of limited public dollars: investments in assets that appreciate in value to the regional economy rather than projects that will require reprogramming again within a generation.

Beyond the economic argument, the quality of life case is equally compelling. Southeastern Pennsylvania communities that are well-served by transit, safe streets,

and active transportation infrastructure attract residents, retain talent, and sustain thriving commercial corridors. Neighborhoods severed by highways — particularly the communities adjacent to I-95 in South Philadelphia — have paid the price of past infrastructure decisions in the form of reduced property values, concentrated air pollution, and a diminished public realm. The STIP is an opportunity to begin reversing those harms, not compounding them. Investing in transit, trails, and complete streets is an investment in the long-term health, livability, and economic competitiveness of the entire region.

We welcome the opportunity to discuss these comments further and stand ready to work with PennDOT and DVRPC toward a final program that delivers the greatest possible return — economic, environmental, and social — for the people of southeastern Pennsylvania.

Respectfully submitted,

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5th Square Advocacy is a 501(c)4 non-profit focused on grassroots advocacy for a more affordable, safe, accessible, sustainable, equitable Philadelphia.

Transit Forward Philadelphia is a 501(c)3 non-profit that advocates for transit improvements that benefit all Philadelphians and which better connects the Greater Philadelphia region.