

**2017 SMART SCALE
Responses to Comments**

Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
9/11/2017	Verbal Comment	Paul Agnello	Fredericksburg Area Metropolitan Planning Organization	Culpeper	General	General	Drilling down to reduce project costs is a great way to reduce expenses, but how do we increase revenues to build the transportation funding pot?	The best way to build consensus and support for additional transportation revenues to is to show existing revenues are being used wisely and effectively. Any change in revenues will require legislative approval.
10/20/2017	Letter to Secretary Layne	Phyllis Randall	Loudon County Board of Supervisors	NOVA	Policy	Application Limits	The Country has genuine disagreement with any proposed change that seeks to limit the number of local government applications. Our Board, like other governing bodies which provide substantial financial support for transportation, should have an opportunity to submit as many projects as necessary to meet with we believe are the County's transportation needs.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4.
8/31/2017	Email to DRPT	Robert Brown	Loudon County	NOVA	Policy	Application Limits	Limitations on the number of applications will likely have the opposite result, more applications because some jurisdictions that have limited needs may see an obligation to meet the limits, or be criticized for not maximizing their opportunity for funds. In addition, as the process goes next to every other year for submitting applications, limiting the number of applications makes this proposal even more problematic.	The SMART SCALE team continue to recommend a limitation on the number of applications to be submitted to ensure adequate time for scoring and quality control reviews. A secondary and equally important reason is to ensure quality over quantity to encourage applicants to submit their best projects to compete for limited resources.
8/31/2017	Email to DRPT	Robert Brown	Loudon County	NOVA	Policy	Application Limits	If the issue is staff and time, a suggestion is to reduce the complexity of the current applications so that the scoring could become more "automated", or provide the tools used in the Central Offices to the Districts so more of the scoring could be done locally, not all at the Central Office. In conclusion, Loudoun County objects to the draft change to the Smart Scale process that would place any limit on the number of applications anyone could submit.	The SMART SCALE team continue to evaluate opportunities to streamline the analysis under the existing process and automate where possible.
8/11/2017	email to DPRPT	Jina S. Freiburg	City of Falls Church	NOVA	Policy	Application Limits	The City of Falls Church is supportive of adding limits on the number of applications by population. As a smaller jurisdiction, the City has limited staff resources available to work on grant applications. There are no limits proposed for the amount of funding for which jurisdictions or agencies can apply. Limiting the number of applications each jurisdiction is able to submit will allow jurisdictions to prioritize which projects are most important.	The SMART SCALE team agrees that this will encourage applicants to focus on priorities within their jurisdiction.
7/18/2017	email to DPRPT	Allan Fye	City of Alexandria	NOVA	Policy	Application Limits	The City recommends that there be no cap on the number of projects that a jurisdiction can submit. However, if the CTB feels there should be a cap, the number should be increased.	At the October meeting of the CTB, the Board increased the cap for Tier 2 applicants from 8 applications to 10.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Policy	Application Limits	Regarding the cap on number of applications that can be submitted by the applicants, the Counties were not in favor of the cap and wanted higher cap or no cap. The localities also requested clarification on the source to be used for determining the population. Clarify number of applications by transit agencies. For example: Will Alexandria's DASH service applications be counted towards the cap on the number of applications for the City. One of the suggestions was to not count the applications by unincorporated Towns towards the cap for the County. For NoVA following is a list of unincorporated Towns: Fairfax- Town of Clifton Prince Williams - Town of Haymarket, Town of Occoquan, Town of Quantico Loudoun - Town of Lovettsville, Town of Hillsboro, Town of Hamilton, Town of Middleburg, Town of Round Hill	Frequently asked questions were posted on-line on October 2, 2017 to provide clarity on who is eligible to submit and the application caps. The listing of eligible entities, population data and tier/maximum number of applications is located on line at http://vasmartscale.org/resources/default.asp . The responsibility for transportation in those towns that do not receive maintenance payments is with the County. Counties are encouraged to coordinate with towns and prioritize candidate projects for submission similar to the Secondary Six-Year Plan process. At the October Board meeting, the CTB adjusted its policy to so that a board member may allow one additional application from one county within their district if (i) the project is located within a town that is ineligible to submit projects and (ii) the county in which the town is located submitted the maximum number of applications allowed. Only one such additional application is allowed per district.

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9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Policy	Application Limits	Need to clarify cutoff date for locality to select the number of projects (4 or 8) to refine and submit applications. Once submitted can a project be substituted with another prescreened project before August 1st?	The deadline for submission of applications is August 1, 2018. Applicants will only be restricted on the number of applications that can be submitted. Prior to the application deadline, applications can be submitted, unsubmitted, edited and swapped. After the deadline, the Portal will be locked down and a project cannot be substituted.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Policy	Application Limits	No cap on the number of applications If CTB decides to impose a cap, the number should be higher (8 to 10) than the proposed cap of 4. <ul style="list-style-type: none"> •Please clarify how Commonwealth determines population – ex. Census, annual population estimate via American Factfinder, etc. •If a cap is imposed, clarification regarding whether a jurisdiction (ex. Alexandria) is considered separate from a local transit agency (ex. DASH) 	Frequently asked questions were posted online on October 2, 2017 to provide clarity on who is eligible to submit and the application caps. The listing of eligible entities, population data and tier/maximum number of applications is located on line at http://vasmartscale.org/resources/default.asp and Alexandria is a separate applicant from DASH. At the October meeting of the CTB, the Board increased the cap for Tier 2 applicants from 8 applications to 10.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Policy	Application Limits	Regarding the proposed caps on the number of applications each entity may submit for consideration, we recognize the need to keep overall application numbers reasonable to enable staff to adequately evaluate each proposal. However, we are concerned that the proposed caps may discourage some localities and regions from submitting beneficial but small scale bicycle and pedestrian improvements despite the success many of these projects have had thus far under SMART SCALE and their importance in meeting the states multimodal goals.	The SMART SCALE team continues to encourage multimodal solutions and as noted, bicycle and pedestrian improvement projects have had success in the prioritization process. It should also be noted that many highway projects include bicycle and pedestrian improvements as part of the scope of the project.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Policy	Application Limits	City supports limits on number of applications by population. Smaller jurisdictions have limited resources to work on applications. With no limit on amount of funding for which jurisdictions can apply, limiting number of applications allows applicants to priority most important projects and ensure equity and fairness for all localities	The SMART SCALE team agrees that this will encourage applicants to focus on priorities within their jurisdiction.
9/23/2017	Letter to Mr. Whitworth	Rick Chandler	Harrisonburg Rockingham Metropolitan Planning Organization	Staunton	Policy	Application Limits	HRMPO does not support the proposed limits on applications. Counties with towns will be limited in their ability to apply for their own projects if they must also submit applications on behalf of towns that do not maintain their own streets and road. The ability of the MPO or PDC to apply on behalf of a town is imperfect given that regional agencies cannot apply for projects in UDS or for District Grant funding. <ul style="list-style-type: none"> • The limit of 4 applications could create a project backlog were unsuccessful applications from the previous round are still priority projects for a locality, but their resubmission limits the locality's ability to apply for new projects of equal need that have arisen in the ensuring two-year cycle. • Limiting the number of applications for smaller localities may unintentionally create an imbalance in what was intended to be a statewide prioritization process to select the best projects. If smaller localities are limited to four applications, then their fifth project, never submitted, but potentially more competitive than a fifth project from a 200,000+ locality will not be considered. • One solution is setting application limit of 6 across the board. Alternately, towns that do not maintain their own roads could submit one application per cycle through the county, without the applications counting toward a county's limit. • Additionally, legacy applications from previous rounds of SMART SCALE could be resubmitted without counting toward the limit. These applications have already been screened in and reviewed and do not impose the same burdens for review as do new applications. 	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10, most have a limit of 4. The responsibility for transportation in those towns that do not receive maintenance payments is with the County. Counties are encouraged to coordinate with towns and prioritize candidate projects for submission similar to the Secondary Six-Year Plan process. At the October Board meeting, the CTB adjusted its policy to so that a board member may allow one additional application from one county within their district if (i) the project is located within a town that is ineligible to submit projects and (ii) the county in which the town is located submitted the maximum number of applications allowed. Only one such additional application is allowed per district. Please note the recommendation to allow legacy applications to bypass the limits does not result in significant time savings for the SMART SCALE team, as all applications must still be reviewed and evaluated pursuant to the current scoring procedures.

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7/18/2017	Letter to Mr. Whitworth	Doug Stanley	Northern Shenandoah Valley Regional Commission	Staunton	Policy	Application Limits	The PDC does not support the limit on applications as it will disproportionately favor large jurisdictions over smaller ones. A uniform cap of 7 applications per eligible applicant would produce more equitable outcomes for our region while maintaining a reasonable limit on applications overall.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10.
9/21/2017	Letter to Secretary Layne	Paul Milde	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Policy	Application Limits	The proposed application limits would disproportionately limit the applications for localities and MPOs/PDCs compared to transit agencies. Localities and MPOs/PDCs have a broader multimodal transportation planning responsibilities than transit agencies, and therefore it does not appear reasonable that transit agencies would have the same number of applications as a locality/MPO/PDC for the given Tier level. Also the application limit for locality/MPO/PDC also seems low. Suggested change of application limits for Tier 1 localities/MPOs/PDCs at 5 and for Tier 2 at 10 while transit agencies would be limited to 2 at Tier 1 and 4 at Tier 2. The alternate application limit approach would reduce the potential maximum number of application compared to the draft state recommendation.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10. It is noteworthy that transit, rail, and TDM projects are scored using the same measures as highway, bike, and pedestrian projects, and thus are selected based on the same relative benefits to the overall transportation system. Using the population based approach, transit agencies are given an equal playing field to compete for funding.
10/10/2017	Letter to Mr. Whitworth	Stephen King	Rockingham County	Staunton	Policy	Application Limits	Rockingham County does not support application limits for localities with fewer than 200,000 people for several reason. <ul style="list-style-type: none"> • Rockingham has 7 towns that are not eligible to apply, which severely limits their ability to apply for County projects if they must also submit on behalf of the towns. The ability of the PDC to apply on a town's behalf is an imperfect solution since regional agencies cannot apply for projects in UDAs or for District Grant funding. • The limit of 4 applications could create a backlog were unsuccessful applications from previous rounds are still priority projects, but their resubmission will limit the county's ability to apply for new projects of equal need in ensuing rounds. • Limiting the number of applications for smaller localities does not appear to be in keeping with the original intent, which was to allow localities to compete on an "even playing field". If smaller localities are limited to 4 applications, then their 5th project, never submitted, but potentially more competitive than a 5th project from a 200,000+ locality will not be considered. • Possible solution is to set the application limit to six, or allowing towns to submit one application per cycle that does not count toward the county's limit. Additionally, previously submitted application could be resubmitted without counting toward the limit. These applications have already been screened in and reviewed, so do not impose the same burdens for review as new applications. 	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10, most have a limit of 4. The responsibility for transportation in those towns that do not receive maintenance payments is with the County. Counties are encouraged to coordinate with towns and prioritize candidate projects for submission similar to the Secondary Six-Year Plan process. At the October Board meeting, the CTB adjusted its policy to so that a board member may allow one additional application from one county within their district if (i) the project is located within a town that is ineligible to submit projects and (ii) the county in which the town is located submitted the maximum number of applications allowed. Only one such additional application is allowed per district. Please note the recommendation to allow legacy applications to bypass the limits does not result in significant time savings for the SMART SCALE team, as all applications must still be reviewed and evaluated pursuant to the current scoring procedures.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Application Limits	The Alliance supports limiting the number of projects submitted by local jurisdictions but takes no position on whether it is 4, 8 or another #. Jurisdictions should not be allowed or encouraged to "dump their project buckets" into Smart Scale process.	The SMART SCALE team agrees that this will encourage applicants to focus on priorities within their jurisdiction.

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10/18/2017	Email to the Portal	Joe Vidunas	Hanover County	Richmond	Policy	Application Limits	Sec. 1.2 Roles and Responsibilities The proposed revision imposes a limit of 4 applications for small localities and 8 for larger localities, transit providers and regional agencies. For our purposes this limit is reasonable. We acknowledge that others see the need for more flexibility and we support changing this limit to a scaled approach that would allow a minimum of 1 up to a maximum of 10 applications, in proportion to population, which we believe would result in an equitable distribution of applications. We understand the need to manage the total number of application relative to staff resources.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. Please note that the approach of scaling application limits based on population was evaluated; but was dismissed as it was deemed to negatively impact smaller localities.
10/18/2017	Letter to Secretary Layne	Barbara Nelson	Richmond Regional Transportation Planning Organization	Richmond	Policy	Application Limits	The proposed application limit (Section 1.2, Page 5) will impose an arbitrary barrier for applicants . The legislative basis for SMART SCALE (see: Code of Virginia Â§ 33.2-214.1) contemplates only one applicable screening criteria: VTrans. RRTPO believes that the purpose of SMART SCALE is to fund the right transportation projects through a prioritization process that evaluates each eligible projects merits. Eligibility is clearly defined as meeting an identified VTrans need. The proposed cap that departs from the legislation, and will result in important projects being left out of the process. Recommendation: remove the application limit and table for future consideration. Other proposed adjustments and the time extension should be sufficient and the new changes need to be assessed for effectiveness. However, if the CTB implements an application limit for the upcoming cycle, the RRTPO recommends the following approach for applications submitted by jurisdictions: One application per 25,000 population in each jurisdiction, with a minimum of four applications and a maximum of thirty. Additionally, the RRTPO recommends that unutilized application opportunities by a local jurisdiction be made available to other local jurisdictions through a regional decision-making process. Finally, in determining application thresholds, the CTB is encouraged to consider other factors beyond population such as, the impact of substantial changes in daytime populations in employment-dense jurisdictions.	The CTB has determined through its policy that projects must be sufficiently developed in order to calculate the benefits. Additionally, through both legislation and CTB policy there are certain other eligibility requirements that must also be met before a project can advance in the prioritization process. Transportation funding is limited and applicants are encouraged to prioritize their needs.
10/19/2017	Letter to Mr. Whitworth	John Willingham	WinFred Metropolitan Planning Organization	Staunton	Policy	Application Limits	A two-tiered limit on the number of applications a jurisdiction may submit based on population, if implemented, will disproportionately favor large jurisdictions over smaller ones. A uniform cap would produce more equitable outcomes for our region while maintaining a reasonable limit on applications overall	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10, most have a limit of 4.
10/19/2017	Letter to Secretary Layne	Megan Cronise	Roanoke County Department of Community Development	Salem	Policy	Application Limits	Application Limit: Increase to 5 for localities less than 200K in size, Increase to 8 for all Transportation Management Area Metropolitan Planning Organizations (TMA MPOs). The Roanoke Valley TPO is the only TMA MPO that will not be permitted to submit 8 applications.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4.

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9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Application Limits	Fairfax County has not submitted more applications than the proposed limits allow. However, the Board does not support a limit on the number of applications. This is especially true, since there are few other options to apply for funding, and the SMART SCALE process is the process developed by the Commonwealth to secure funding. Further, more populated areas may have a higher number of projects, due to their size and significant congestion they currently face. If a governing body believes it is in the best interest of their jurisdiction to submit more than eight applications, it should be allowed to do so.	While Fairfax County has submitted a reasonable number of applications, especially considering the size of the County and its significant transportation needs, other localities have not exercised the same restraint. The SMART SCALE team continues to be concerned about their ability to score all potential applications within the necessary timeframe in the absence of an application limit. A secondary and equally important reason is to ensure quality over quantity to encourage applicants to submit their best projects to compete for limited resources.
9/21/2017	Letter to Secretary Layne	Paul Milde	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Policy	Application Limits	Proposed limits would disproportionately limit the number of applications for localities and MPOs/PDCs compared to transit agencies. Localities and MPOs/PDCs have broader multimodal transportation planning responsibilities that transit agencies and therefore it does not appear reasonable that transit agencies would the same number or applications a locality or MPO/PDC for a given Tier Level. The application limits for localities and MPOs/PDCs is a little low. Suggest an alternate application limit approach that would limit the number of applications for Tier 1 localities and MPOs/PDCs at 5 for Tier 2 at 10 while transit agencies would be limited to 2 at Tier 1 and 4 at Tier 2 as shown below. This alternate application limit approach would reduce the potential maximum number of Smart Scale applications compared to the Draft State Recommendation.	The original reason for the proposed application limits is to ensure a more predictable and manageable number of applications that the state must evaluate prior to selection and to ensure adequate time for scoring and quality control reviews. A secondary and equally important reason is to ensure quality over quantity to encourage applicants to submit their best projects to compete for limited resources. Another aspect of limiting the number of applications is in the spirit of fairness. It is noteworthy that transit, rail, and TDM projects are scored using the same measures as highway, bike, and pedestrian projects, and thus are selected based on the same relative benefits to the overall transportation system. It is also the goal of the SMART SCALE prioritization process to encourage a multimodal transportation system and reducing the application limit for transit agencies may limit opportunities for a balanced transportation system.
10/20/2017	Letter to Secretary Layne	John Budesky	Goochland County	Richmond	Policy	Application Limits	The purpose of SMART SCALE is to fund the right transportation projects through a data driven prioritization process. Eligibility is clearly defined as meeting a VTrans need. The proposed revision would create an arbitrary cap that departs from the legislation and may result in competitive projects being left out of the process. If the number of applications are limited by population, Goochland County would recommend the CTB consider additional application thresholds such as impact of substantial changes in daytime populations in employment denit jurisdictions.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10, most have a limit of 4.
10/20/2017	Email to the Portal	John Bishop	Frederick County Board of Supervisors	Staunton	Policy	Application Limits	On October 11, 2017 the Frederick County Board of Supervisors authorized staff to raise the following concerns regarding the updates to the Smart Scale application process. 1. The limit to 4 applications to localities of our size. In the past two rounds, Frederick County has submitted 5 an 9 applications in addition to those submitted through the MPO. The limitation to 4 for a locality with our transportation challenges is very concerning. While we recognize the ability to take advantage of additional applications through the MPO and Regional Commission, we have to split those resources with a number of other localities.	The topic of application limits has generated much discussion; however, at the October meeting of the CTB, the Board made its final determination and increased the cap for Tier 2 applicants from 8 applications to 10. The limit for Tier 1 applicants remains at 4. It should be noted that there are only 18 of 257 applicants that have a limit of 10, most have a limit of 4.
10/19/2017	Letter to Secretary Layne	Megan Cronise	Roanoke County Department of Community Development	Salem	Policy	Application Limits	Exclude applications from the Application Limit cap that are in conformance with the Arterial Preservation Program studies	The primary reason for the application limits is to ensure a more predictable and manageable number of applications that the state must evaluate prior to selection and to ensure adequate time for scoring and quality control reviews. A secondary and equally important reason is to ensure quality over quantity to encourage applicants to submit their best projects to compete for limited resources.

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10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Policy	CTB Reevaluation and Public Involvement	It is also important to clarify that public review and input will be sought regarding the CTB's reevaluation of a project due to changes in scope. In Section 5.2, the draft provides that in cases in which the scope of a project changes to the extent that it would impact its original SMART SCALE benefits score, the project may be reevaluated, and the CTB will be required to approve the change in scope in certain circumstances (i.e., when the project's revised score would drop below the lowest-ranked funded project in the same district for that round of SMART SCALE). While the draft mentions that the results of this reevaluation "will be made publicly available," we urge you to clarify that these results will be made available at least three weeks prior to the CTB decision to allow for adequate public review in cases where CTB action is required to approve the proposed change in scope.	Need assistance with this response. The Board's action is to affirm its continued funding support for the project in light of the anticipated impact of the proposed scope change, not to approve the actual change in scope. The federal and state project development process includes robust public involvement requirements and in fact, some of the changes to a project scope may be the result of the public involvement process.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Funding Policy	It is clearly admitted in the SMART SCALE FAQ that some of the new planning requirements may in fact be invalid six years after funding becomes available. This "risk" seems to be inequitable to both those applicants who are/are not funded. Can this not be mitigated through more coordination and flexibility on the part of VDOT throughout the project cycle?	The SMART SCALE team understands the concerns of certain required documents for project readiness and agree that there is some risk in having certain information well in advance; however, we do not want to select a project for funding to then find out it cannot advance for a variety of reasons. If documentation is required to be updated this would be considered an eligible project expense and should be included in the cost estimate. Applicants should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the study. Frequently asked questions were posted online on October 2, 2017 to provide additional clarity on the required level of documentation needed. Additionally, the SMART SCALE Technical Guide has been updated to provide additional clarity. Both documents are available online at http://vasmartscale.org/resources/default.asp
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Policy	Funding Policy	Regarding the full funding policy there was concern that it may impact the ability of the localities to leverage different types of local and regional funds. Clarity on what is meant by "Committed"	Committed funds is defined as funds that are committed to cover the difference in total project cost and SMART SCALE request so that the project is fully funded through construction. Applicants are encouraged to identify other sources of funding (local, regional, proffers, other state/federal funds) to reduce the amount of SMART SCALE funding. However, since committed funds are used to leverage and reduce the SMART SCALE requested amount forming the basis of SMART SCALE Score, applicants must submit a letter of commitment that they are responsible for such committed funds even if the original source of the funds is no longer available.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Policy	Funding Policy	We support the proposed changes to clarify that projects that have already been fully funded through other funding sources will not be eligible for SMART SCALE. In previous rounds, a number of projects were submitted for consideration that had already been proffered for construction by private developers. Considering the limited funding available for new projects, the Commonwealth should not foot the bill for projects like these, particularly in cases where the relevant private development will capture much of the benefit.	none needed

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8/1/2017	Letter to Secretary Layne	Linda Johnson/Michael Hipple/	Hampton Roads Transportation Planning Organization and Hampton Roads Transportation Accountability Commission	Hampton Roads	Policy	Funding Policy	HRTPO and HRTAC request policy be made clear that the policy does not apply to projects with HR Transportation Fund allocations for several reasons, 1) Virginia law does not allow HRTF to be taken into consideration when determining the amount of other funding to be made available to Hampton Roads, 2) HRTF is used to build large-scale regionally significant projects, most on the interstate system - it is neither fair nor appropriate to expect such projects to be carried out without significant state or federal funding participation, 3) for HRTAC and VDOT to enter into agreement, the agreement must include a detailed plan of all necessary funds - thus many projects are reflected as fully funded with HRTF funds with the intent to apply for SMART SCALE.	Clarity has been added to the Technical Guide and the CTB policy.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Funding Policy	The Alliance agrees that Smart Scale Funds should not substitute for or be used in place of existing committed funds. The Alliance agrees that a funding plan for a project should be identified but that the process must allow for changes in the plan	none needed
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Funding Policy	There are other large projects that may not cost \$1billion but concern that this will impact the ability to leverage different types of funds.	The intent of this requirement is to avoid using limited state and federal resources for projects that are already fully funded. SMART SCALE funding may not be used to supplant funding already committed to projects in a capital improvement program or transportation improvement program, or required to be paid by a developer as a result of a local zoning process. Allocations identified only in a long-range plan or illustrative funding plan would not be considered committed for purposes of determining whether a project is fully funded. Clarifying language has been added to the SMART SCALE Technical Guide.
10/11/2017	Letter to Secretary Layne	Paul Agnello	Virginia Association of Metropolitan Planning Organizations	Statewide	Policy	General	VAMPO recommends that the CTB action on proposed revisions to SMART SCALE be deferred until December to provide additional time for public comment. The Draft Technical Guide was released for public review on August 21. Additional changes were recommended at the September CTB meeting and are continuing. The evolving changes make developing comments a challenge and the public should have a complete set of revisions prior to commenting. Delaying final CTB action would allow for development of fully-formed feedback without impacting the proposed March 1, 2018 start date for Round 3. VAMPO recommends the CTB use the October meeting to evaluate comments received and provide direction on how to incorporate, post a final draft of revisions and provide additional public comment until November 17.	The CTB opted to approve the proposed changes at its October board meeting. Final documents are available at http://vasmartscale.org/resources/default.asp .
10/10/2017	Letter to Mr. Whitworth	Stephen King	Rockingham County	Staunton	Policy	General	The County supports and appreciates the improvements to the Safety and Accessibility measures and requirements to ensure public input through a public hearing prior to application submission.	none needed
8/1/2017	Letter to Secretary Layne	Linda Johnson/Michael Hipple/	Hampton Roads Transportation Planning Organization and Hampton Roads Transportation Accountability Commission	Hampton Roads	Policy	General	Support the SMART SCALE prioritization process, demonstrating a significant improvement in how projects are selected and is based on an objective, outcome-based process that is transparent and holds decision makers accountable.	none needed

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7/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	General	Process tends to benefit smaller projects. For comparison done with previous SYIP, \$20 million used to define large project is not adequate. In NOVA \$20 million is a small or medium sized project. Applications are time consuming and probably costly to review. Question remains as to whether this process is sustainable over time. Questions remains as to whether this process is sustainable over time. Does greater analysis lead to a better project selection than could be achieved by a more streamlined analysis?	The analysis has been modified as suggested and the results are as follows: <ul style="list-style-type: none"> MORE projects >\$50M are being funded in SMART SCALE than in the FY06 SYIP in terms of number of projects, SMART SCALE allocations, AND total allocations. The original analysis determined project size based on Total Cost, but when determining the amount of funding in each category used only the SMART SCALE funding, which may have been a little misleading. In presenting this information to the CTB in June, we failed to make the most important point and it is even more obvious when you look at a \$50M threshold. SMART SCALE projects are ALL fully funded. However, in the FY06 SYIP, the majority of larger projects were NOT fully funded. Projects with a total cost between \$5M and \$50M were only funded to 80% of their total cost. Projects with a total cost greater than \$50M were only funded to 28% of their total cost. They may have been in the SYIP, but they were not advancing in project development. In fact, the cost to complete them (\$3 billion) was greater than the amount of allocations programmed to them (\$1.2 billion). Now, not only are we funding more projects with a total cost greater than \$50M, we are fully funding them and delivering them.
10/19/2017	Email to the Portal	Joe C. Bonanno	West Piedmont Planning District Commission/Danville MPO	Salem	Policy	Grammar/Typo	Suggested Edits to the Technical Guide	Revisions to the Technical Guide have been made.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Modification	In Section 4.4 Project Cost, first sentence, we recommend replacing the word "cost" with "requested SMART SCALE funding".	The SMART SCALE Technical Guide has been modified.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Other Committed Funding	As the SMART SCALE Technical Guide and related documents are refined for the third round of funding, we would ask that a more equitable solution be developed to allow regions/construction districts without taxing authority the ability to equitably leverage other funds, thereby leveling the playing field. The Secretary's comments at the Salem District Fall Transportation Meeting on October 12, 2017 reflected a willingness of the administration to work with such regions/districts and we look forward to any progress (administratively or legislatively) that can be made. Additionally, it is felt that the technical and policy guides should expand on the definition of leveraged funds to allow regions/construction districts without taxing authority the ability to equitably leverage other funds, which again would level the playing field. The SMART SCALE Policy Guide indicates that such inequity could occur, but why is this being allowed?	Applicants are encouraged to identify other sources of funding (local, regional, proffers, other state/federal funds) to reduce the amount of SMART SCALE funding. In-kind contributions or right-of-way donations are also allowed to reduce the amount of SMART SCALE funding. If such items are included as a part of the project's cost estimate, the applicant should denote that the value of such items are reflected as "Other Committed Funds" in the Phase Estimate and Schedule Table in the SMART SCALE application.
9/11/2017	Verbal Comment	Kevin McDermott	Albemarle County	Culpeper	Policy	Proffers	Concerned that proffered projects are no longer eligible, based on proposed changes. Of particular concern is the Berkmar Extension project, which includes UVA Foundation land that is tied to a developer's proffer.	If the applicant desires to submit a project with proffered conditions and seeks to obtain SMART SCALE funding for, or in lieu of the proffer, the proffer must have been legally rescinded or terminated before the applicant may submit an application for the project.

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Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
10/11/2017	Letter to Secretary Layne	Douglas Walker	Albemarle County	Culpeper	Policy	Proffers	The County agrees, in general, that SMART SCALE should avoid funding projects that are already funded from other sources, however, there can be unintended consequences. The County has submitted a project for SMART SCALE that was not successful for funding. The project was one segment of a new roadway but is fully proffered but the threshold for development is likely many years into the future. The proffer was established in 1995 and land use and traffic patterns have changed and the project is needed. Albemarle County has moved surplus funds for the old Secondary Construction Program to study the potential alignment for the new roadway. Additionally, the County has begun preliminary design with the intent of submitting the application in the next round. Under this new eligibility requirement, the project would be screened out. The County requests an exception to this eligibility requirement. A suggested change is to apply the eligibility requirement to proffers put in place within 10 or 20 years to recognize the changing nature of development and the transportation system.	If the applicant desires to submit a project with proffered conditions and seeks to obtain SMART SCALE funding for, or in lieu of the proffer, the proffer must have been legally rescinded or terminated before the applicant may submit an application for the project.
10/19/2017	Letter to Mr. Whitworth	John Willingham	WinFred Metropolitan Planning Organization	Staunton	Policy	Proffers	Acknowledging the potential abuse of state funds substituting for proffers, we seek clarification as to the circumstances under which proffered elements may be used to leverage SMART SCALE funds	If proffered improvements are included as a part of the project's cost estimate, the applicant should denote that the value of such items are reflected as "Other Committed Funds" in the Phase Estimate and Schedule Table in the SMART SCALE application.
10/18/2017	Email to the Portal	Sarah Rhodes	Richmond Regional	Richmond	Policy	Project Eligibility	Project Eligibility - Expands on project eligibility requirements, but does not fully articulate certain qualifying factors. o Please define the term "significant portion" as related to project scope and state of good repair. Please clarify the meaning of flexibility related to projects expected to exceed \$1 billion.	The SMART SCALE team considered establishing a percentage threshold to define "significant portion" but such a policy would require detailed cost estimates for each project component. This level of cost estimate is often not available at the time the project is submitted for consideration. For this reason a qualitative assessment will be needed to determine if a significant portion of the project is related to the repair or replacement of existing facilities.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Project Eligibility	Supports clarification on eligibility related to repair or replacement of existing facilities	The SMART SCALE Technical Guide has been revised to include additional guidance.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Project Eligibility	The Alliance supports the recommendation that repair/replacement projects not be eligible for Smart Scale	none needed
10/20/2017	Letter to Secretary Layne	Phyllis Randall	Loudon County Board of Supervisors	NOVA	Policy	Project Readiness	The CTB proposes to request "project readiness" information that will be unavailable at the time of application, or will be outdated by the time of project implementation during funding cycles. Example requirements include: interchange justification reports, traffic signal warrants, corridor optimization and alternatives for new lanes, and demonstration of public support. Jurisdiction will likely be required to revise, or repeat this same documentation; and thus increase project costs and cause possible delays.	The SMART SCALE team understands the concerns of certain required documents for project readiness and agree that there is some risk in having certain information well in advance; however, we do not want to select a project for funding to then find out it cannot advance for a variety of reasons. If documentation is required to be updated this would be considered an eligible project expense and should be included in the cost estimate. Applicants should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the study. Frequently asked questions were posted online on October 2, 2017 to provide additional clarity on the required level of documentation needed. Additionally, the SMART SCALE Technical Guide has been updated to provide additional clarity. Both documents are available online at http://vasmartscale.org/resources/default.asp

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Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
10/20/2017	Letter to Secretary Layne	John Budesky	Goochland County	Richmond	Policy	Project Readiness	Smart Scale revisions establishes new requirements for project readiness, without indication of resources to meet requirements. This impacts small localities in a negative way. It would be helpful if the CTB provided a list of funding sources or programs available to assist localities developing supporting materials proposed to be required for certain projects.	The applicant should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the necessary documentation.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Policy	Project Readiness	Requirement if any new signals are part of total project -Additional cost and time needed for analysis prior to application -Funds several years out, so conditions / needs could change by the time funding is available -Jurisdiction should include AA (Alternatives Analysis) to justify project -Q: what level of analysis is required? Ex. If city seeks \$ for multi-modal bridge, new stress per SAP's	VDOT and DRPT understand the concerns of certain required documents for project readiness and agree that there is some risk in having certain information well in advance; however, we do not want to select a project for funding to then find out it cannot advance for a variety of reasons. Applicants should coordinate with district staff to determine the availability of resources to assist with the study. Frequently asked questions were posted online on October 2, 2017 to provide additional clarity on the required level of documentation needed. Additionally, the SMART SCALE Technical Guide has been updated to provide additional clarity. Both documents are available online at http://vasmartscale.org/resources/default.asp
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Policy	Project Readiness	Please define 'coordinate' and provide NEPA-related expectations -For projects seeking funding several years in advance, NEPA may not have started	DRPT and/or VDOT district staff will assist applicants in determining the level of environmental study needed and if alternatives analysis may be required, in cases where NEPA has not been initiated. This will occur during the application in-take period.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Policy	Project Readiness	We support a number of the proposed changes in Section 2.2 to clarify submission requirements and require greater information in applications, such as clarifying that project descriptions should focus on the scope of the project rather than its expected benefits, as well as requiring an applicant to show that it has evaluated upgrades to existing facilities before submitting an application for a new highway or major widening. This up-front analysis is essential to make sure the Commonwealth is spending its limited transportation dollars wisely, and that projects are not being proposed that are more costly or harmful than necessary to address the relevant need. However, one potential shortcoming in the proposed draft is the recently-added definition of "major widening," which appears to only cover "the addition of two or more general purpose lanes." We see little reason to limit this category to "general purpose" lanes, given that significant increases in cost and impacts may accompany any widening of this scale, regardless of how the lanes are utilized (whether general purpose, tolled, HOT, or HOV). This definition should be expanded to cover any widening project of two lanes or more.	We intentionally limited the definition of major widening to exclude improvement such as turn lanes and acceleration/deceleration lane extensions. With respect to tolled, HOV or HOT lanes, these types of improvements typically go through an extensive planning process and are often alternatives to constructing more general purpose lanes. These types of facilities promote carpooling and transit usage, thereby increasing person throughput along congested corridors.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Policy	Project Readiness	Proposed changes on required level of project planning are excessive especially considering many projects will not be funded for 5-6 years after application submission. The City has limited resources available to conduct engineering studies prior to applying for funding.	VDOT and DRPT understand the concerns of certain required documents for project readiness and agree that there is some risk in having certain information well in advance; however, we do not want to select a project for funding to then find out it cannot advance for a variety of reasons.

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9/28/2017	Letter to Mr. Whitworth	Rick Chandler	Harrisonburg Rockingham Metropolitan Planning Organization	Staunton	Policy	Project Readiness	Concern that Technical Guide does not include sufficient detail on the project readiness requirements for specific project types. Local governments will incur costly studies prior to application, which places financial burden on smaller local governments, without any guarantee that a project will be funded.	<p>The SMART SCALE Technical Guide has been updated to further define the level of documentation required. Should a study be needed, the applicant should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the study.</p> <p>Frequently asked questions were posted online on October 2, 2017 to provide additional clarity on the required level of documentation needed. Additionally, the SMART SCALE Technical Guide has been updated to provide additional clarity. Both documents are available online at http://vasmartscale.org/resources/default.asp</p>
10/10/2017	Letter to Mr. Whitworth	Jim Baker	City of Harrisonburg	Staunton	Policy	Project Readiness	The City does not support the proposed requirement for signal warrants since they maintain their own signal systems	The Technical Guide has been updated to address the concern for jurisdictions who maintain their own systems.
10/10/2017	Letter to Mr. Whitworth	Stephen King	Rockingham County	Staunton	Policy	Project Readiness	<p>By requiring expensive studies and analysis of projects prior to analysis, places a financial burden on smaller local governments without any guarantee a project will be funded. This is not in keeping with the original intent and assurances that costly feasibility and scoping studies would not be required.</p> <p>Possible solution is to impose these requirements for projects seeking Right of Way or Construction funds. For projects seeking preliminary engineering, right of way and construction funds, the readiness requirements should apply at key milestones in project development. this allows localities to have confidence that the project will be funded and be willing to invest in those studies. A clause could be added to project agreements that states if during the PE phase all of the project readiness requirements are not satisfied, then project funding will be removed.</p>	<p>The SMART SCALE team understands the concerns of certain required documents for project readiness and agree that there is some risk in having certain information well in advance; however, we do not want to select a project for funding to then find out it cannot advance for a variety of reasons. Based on the proposed solution, it is possible that funds would be expended on a project that may not be able to advance. In such cases, the applicant may have to pay back the funds. Applicants should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the study.</p> <p>Frequently asked questions were posted online on October 2, 2017 to provide additional clarity on the required level of documentation needed. Additionally, the SMART SCALE Technical Guide has been updated to provide additional clarity. Both documents are available online at http://vasmartscale.org/resources/default.asp</p>
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Project Readiness	The Alliance agrees that reasonable, enhanced documentation should be required but believes that the proposed requirements are excessive	<p>The SMART SCALE team understands the concerns of certain required documents for project readiness and agree that there is some risk in having certain information well in advance; however, we do not want to select a project for funding to then find out it cannot advance for a variety of reasons. Applicants should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the study.</p> <p>Frequently asked questions were posted online on October 2, 2017 to provide additional clarity on the required level of documentation needed. Additionally, the SMART SCALE Technical Guide has been updated to provide additional clarity. Both documents are available online at http://vasmartscale.org/resources/default.asp</p>
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Project Readiness	The Alliance believes that requiring some additional documentation and additional expenditures may have the positive effect of reinforcing the need for local jurisdictions to limit their submissions.	none needed
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Project Readiness	The Alliance recommends definition of "major widening" of existing facility be more precisely defined	For SMART SCALE purposes, major widening describes any project that adds one or more through lanes for two or more miles.
10/18/2017	Email to the Portal	Sarah Rhodes	Richmond Regional	Richmond	Policy	Project Readiness	Project Readiness Establishes New requirements for project readiness, without indication of resources to meet requirements. o Please provide a list of funding sources or programs available to assist localities developing supporting materials proposed to be required for certain projects.	The applicant should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the necessary documentation.

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Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
10/19/2017	Letter to Secretary Layne	Megan Cronise	Roanoke County Department of Community Development	Salem	Policy	Project Readiness	What constitutes Major Widening? For example, would the Route 419 Widening, Safety, and Multimodal Improvements project, improving a paved shoulder to a third lane for a distance of 2,000 linear feet, be classified as Major Widening?	For SMART SCALE purposes, major widening describes any project that adds one or more through lanes for two or more miles.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Project Readiness	The Board supports efforts to ensure projects are feasible and that initial planning efforts have been completed prior to application for SMART SCALE funding; however, requirements seem excessive. Requiring IJR's with preferred alternatives, approved signal warrant justifications, and locally preferred alternatives prior to submitting applications is a heavy burden. Some of these federally reviewed documents have limited time spans before expiring. This requires significant investment without certainty of funding or that funding may not be available for five or six years. The Board suggest that applicants could provide a plan for conducting review and what alternatives are anticipated to be evaluated. Further, depending on the size of the project, SMART SCALE funding may be needed to complete the IJR or other analyses.	VDOT and DRPT understands the concerns of certain required documents for project readiness and the challenges associated with the shelf-life of certain information. We agree that there is some risk in having certain information well in advance; however, in the absence of the required documents, we risk selecting a project for funding that ultimately cannot advance or secure required approvals at the state or federal level. - An Interchange Justification Report is only required for new access points on limited access facilities. Modifications to existing access points do not require a formal IJR or Interchange Modification Report (IMR) prior to submittal – a planning study is sufficient. For all interchange projects, new or modifications to existing, VDOT needs to understand the specific interchange configuration or modifications proposed for funding in order to calculate the benefits. - Applicants concerned about resources needed to conduct a signal warrant analysis or Interchange Justification report should contact their VDOT District Planner to coordinate technical assistance.
10/20/2017	Email to the Portal	John Bishop	Frederick County Board of Supervisors	Staunton	Policy	Project Readiness	3. Project Readiness. Under Smart Scale there is no opportunity for project development within the six year program as there was in the past. This is generally positive. However, the requirement of certain studies which many localities do not have the staff or resources to complete places those localities at a significant disadvantage. This item merits additional consideration and perhaps additional support to localities can be offered for project development. Immediate needs vs long term needs. Near term needs are being given greater priority under Smart Scale. This is understandable. However, VDOT as an organization needs to work to make sure the value of long term and big picture isn't lost in the face of this reality.	The applicant should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the necessary documentation.

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Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Project Size	Process tends to benefit smaller projects. For comparison done with previous SYIP, \$20 million used to define large project is not adequate. In NOVA \$20 million is a small or medium sized project. Beneficial to see how analysis may change if project-size were different, such as \$50m.	The analysis has been modified as suggested and the results are as follows: <ul style="list-style-type: none"> MORE projects >\$50M are being funded in SMART SCALE than in the FY06 SYIP in terms of number of projects, SMART SCALE allocations, AND total allocations. The original analysis determined project size based on Total Cost, but when determining the amount of funding in each category used only the SMART SCALE funding, which may have been a little misleading. In presenting this information to the CTB in June, we failed to make the most important point and it is even more obvious when you look at a \$50M threshold. SMART SCALE projects are ALL fully funded. However, in the FY06 SYIP, the majority of larger projects were NOT fully funded. Projects with a total cost between \$5M and \$50M were only funded to 80% of their total cost. Projects with a total cost greater than \$50M were only funded to 28% of their total cost. They may have been in the SYIP, but they were not advancing in project development. In fact, the cost to complete them (\$3 billion) was greater than the amount of allocations programmed to them (\$1.2 billion). Now, not only are we funding more projects with a total cost greater than \$50M, we are fully funding them and delivering them.
10/18/2017	Email to the Portal	Sarah Rhodes	Richmond Regional	Richmond	Policy	Public Comment Extension	Request an extension of the public comment period deadline from October 20, 2017 to November 17, 2017. The request for this extension is based on the need for clarification regarding several of the proposed amendments.	The CTB opted to approve the proposed changes at its October board meeting. Final documents are available at http://vasmartscale.org/resources/default.asp .
10/18/2017	Letter to Secretary Layne	Barbara Nelson	Richmond Regional Planning District Commission	Richmond	Policy	Public Comment Extension	The RRTPO recommends that the public comment period be extended to November 17, 2917 and that the CTB defer final action regarding these proposed revisions until the December 6, 2017 meeting. This extension will provide additional opportunity for meaningful input, while not impacting the proposed start date for the upcoming SMART SCALE cycle, anticipated to begin on March 1, 2018.	The CTB opted to approve the proposed changes at its October board meeting. Final documents are available at http://vasmartscale.org/resources/default.asp .
10/20/2017	Email to the Portal	John Bishop	Frederick County Board of Supervisors	Staunton	Policy	Public Comment Extension	2. The presentation provided to County staff noted that additional changes could be presented at the October meeting. If additional changes are offered, localities should also be provided the opportunity to comment on them.	The CTB opted to approve the proposed changes at its October board meeting. Final documents are available at http://vasmartscale.org/resources/default.asp .
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Relationship of Major Elements	Need flexibility as some components may not appear to be contiguous or proximate but are actually related.	Project elements must be related such that they are contiguous or of the same improvement type. Applicants should indicate in their application how various project elements are related.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Policy	Resolution of Support	Concern regarding requirement that all Nova projects receive a resolution of support from NVTA: additional red tape and administrative burden/concern that NVTA becomes an additional filter for projects seeking Commonwealth funds?	VDOT and DRPT understand the concerns of this requirement; however, the MPOs need to understand potential impacts to the long range plans before projects are selected for funding. Localities and MPOs are encouraged to follow the planning and prioritization processes currently in use by the MPO.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Policy	Resolution of Support	Projects crossing jurisdictional borders will require resolution of support for each jurisdiction	Yes, this is to ensure support of both jurisdictions before submission.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Policy	Resolution of Support	City does not support proposed change requiring a resolution of support from the regional planning body prior to submitting an application. The City submits projects that are consistent with local and regional plans. Adding a requirement for resolution of support from regional planning body will further lengthen the project application process and burden smaller localities.	VDOT and DRPT understand the concerns of this requirement; however, the MPOs need to understand potential impacts to their long range plans before projects are selected for funding. Localities and MPOs are encouraged to follow the planning and prioritization processes currently in use by the MPO.

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10/19/2017	Letter to Secretary Layne	Megan Cronise	Roanoke County Department of Community Development	Salem	Policy	Resolution of Support	We disagree with the additional requirement that MPOs must endorse all locality projects within the MPO boundary	VDOT and DRPT understand the concerns of this requirement; however, the MPOs need to understand potential impacts to their long range plans before projects are selected for funding. Localities and MPOs are encouraged to follow the planning and prioritization processes currently in use by the MPO.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Resolution of Support	Since all applications now require an MPO/PDC resolution of support, that process does not necessarily entail a public comment opportunity/hearing. Does adoption of a resolution form a public body assume public support, or should something more formal be specified?	Applicants must demonstrate that a project has the support of key stakeholders and that the public has been afforded the opportunity to provide comments and input at the time of application submittal. A resolution of support from the relevant governing body or policy board, approved in a public forum with adequate public notice, is required at the time of application. This policy ensures the public was afforded the opportunity to provide input.
8/1/2017	Letter to Secretary Layne	Linda Johnson/Michael Hipple/	Hampton Roads Transportation Planning Organization and Hampton Roads Transportation Accountability Commission	Hampton Roads	Policy	Resolution of Support	HRTPO and HRTAC request the policy require localities obtain a resolution of support from the relevant MPO regardless of whether they are applying for a COSS or Regional Network. This provides the MPO the opportunity to ensure that projects are consistent with the MPO's fiscally constrained long range plan.	The Technical Guide includes the suggested change.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Policy	Resolution of Support	The Alliance believes endorsement of project applications by local governments and regional authorities is important but that this requirement should be waived in the case where opposition to a project of regional and statewide significance exists only from a local government or special interest	VDOT and DRPT understand the concerns of this requirement; however, the MPOs need to understand potential impacts to their long range plans before projects are selected for funding. Localities and MPOs are encouraged to follow the planning and prioritization processes currently in use by the MPO. Additionally, if a project is federally eligible it must meet the relevant federal requirements for inclusion into the Constrained Long Range Plan (CLRP) and the Transportation Improvement Program in order to make use of funding received through SMART SCALE. Early support minimizes the risk that the project cannot advance. In addition, the CTB may submit up to 2 projects per cycle in the event a high priority project was not submitted.
9/11/2017	Letter to Secretary Layne	Patrick Mauney	Rappahannock Rapidan Regional Commission	Culpeper	Policy	Schedule	Procedural changes – The Regional Commission supports the proposed changes to the Smart Scale procedures, including the application timeline adjustment. The proposed changes should help ensure more efficient use of local and state resources in developing and scoring project applications	none needed
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Policy	Schedule	For the proposed schedule there generally was support for the additional time.	none needed
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Policy	Schedule	Extending application process to 6 months is a good step – additional time to prepare and coordinate with VDOT/DRPT	none needed
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Policy	Schedule	Support additional time but request pre-screening be completed prior to application refinement	The SMART SCALE team will strive to complete pre-screening as quickly as possible once an applicant has submitted certain required information. There are several factors affecting the time for review and feedback, including when an applicant completes pre-application information and the number of applications created. The pre-screening decision will not prevent an applicant from completing their application. Applicants are encouraged to create applications early in the process.

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10/19/2017	Letter to Secretary Layne	Megan Cronise	Roanoke County Department of Community Development	Salem	Policy	Scoring	Consider giving additional points to projects that are in conformance with the Arterial Preservation Program studies	This comment has been shared with the Commonwealth Transportation Board.
10/18/2017	Email to the Portal	Joe Vidunas	Hanover County	Richmond	Policy	Scoring	Sec. 4.5 Project Cost We recommend revising the policy to use a projects total cost in calculating its score. While we appreciate the intent of this policy which is to encourage applicants to bring resources to the table, we believe that this puts smaller localities at a significant disadvantage and potentially allows projects of lesser merit to be awarded funds. In general, the funds dedicated to these projects are public dollars and should be ranked based on Total benefit. The Revenue Sharing Program is a program that best leverages additional road dollars and we encourage full implementation of this program.	The CTB has determined through its policy that the score used for ranking projects will be based on the amount of funding requested. However, they also requested that a score based on total cost be provided to them for information purposes.
9/11/2017	Email to the Portal	Steve Sandy	Franklin County	Hampton Roads	Policy	Scoring	Smart Scale criteria should provide points in the scoring criteria for preventative initiatives. In other words, there should be a way to approve a project that will solve a future problem. As VDOT starts to look at Arterial Preservation, it would be great to have a way to address some of these issues even if it currently is not on top 100 list for safety or currently has congestion.	It should be noted that in prior rounds the congestion measure was evaluated on future conditions; however, at the October CTB meeting, the Board determined the measure should be modified to address current problems rather than future possible problems. For safety concerns, a project does not have to be on the top 100 list if there has been a safety study or other documentation to demonstrate a need.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Policy	Screening & Eligibility	One suggestion was to provide the pre screening and eligibility decision prior to the beginning of application refinement in June.	Applicants will be able to request pre-screening in the SMART Portal. Assuming the pre-screening application is filled out in March or April, the SMART SCALE team should be able to provide a screening and eligibility assessment by June. Depending on the timing and volume of the pre-screening requests, some feedback may extend beyond June.
10/10/2017		Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Policy	Technical Guide Updates Needed	While the draft Technical Guide now requires additional information and analysis to be included in each application, it still does not make clear that all of these applications (and supporting analysis) will be posted on the SMART SCALE site and made available for public review prior to scoring. This should be incorporated into Sections 1.3 and 1.4 of the draft (outlining stakeholder input opportunities and the biennial SMART SCALE schedule), as well as Section 5.1 (covering public comment periods). In Round 2, the public was given the opportunity to comment on statewide applications prior to scoring, but too little information was made available to be able to understand what projects were being proposed and meaningfully comment. Public input at this stage is critical to help ensure that no pertinent issues or options are overlooked in reviewing a proposal, and having all of the complete statewide applications available on the website for review is necessary given the infeasibility of participating in the separate application review processes of each individual submitting entity.	Your comments on public involvement are helpful and the SMART SCALE Technical Guide has been updated to reflect additional opportunities for public involvement. A new requirement has been added whereby applicants must demonstrate that a project has the support of key stakeholders and that the public has been afforded the opportunity to provide comments and input at the time of application submittal. A resolution of support from the relevant governing body or policy board, approved in a public forum with adequate public notice, is required at the time of application. This policy ensures the public was afforded the opportunity to provide input. Regarding opportunities for public review of applications, currently (and for both rounds), copies of applications have been made available at public meetings during the evaluation process. At this time, the SMART SCALE team has not had the opportunity to complete the screening and validation process. Public visibility of all applications is provided as soon as scores are released and the public may comment during the spring public meetings. As a reminder, the process provides some flexibility in that a CTB member may request changes to the staff recommended funding scenario based on public feedback or other information the CTB deems appropriate.

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10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Policy	Technical Guide Updates Needed	The draft includes a new section clarifying that projects for which a "significant portion" of the project costs are related to "in-kind" repair or replacement of existing facilities or that are otherwise eligible for State of Good Repair funding will not be eligible for consideration under SMART SCALE. We recommend providing a definition or explanation of what constitutes a "significant portion" of project costs for purposes of this section. In addition, we recommend adding language to make it clear that this limitation will not apply to projects that are primarily designed to upgrade or retrofit existing facilities to improve accessibility or add multimodal components, such as complete street projects or the incorporation of transit-only vehicle lanes. Projects like these are crucial for the Commonwealth's transition toward a more balanced and accessible transportation network	The SMART SCALE team considered establishing a percentage threshold to define "significant portion" but such a policy would require detailed cost estimates for each project component. This level of cost estimate is often not available at the time the project is submitted for consideration. For this reason a qualitative assessment will be needed to determine if a significant portion of the project is related to the repair or replacement of existing facilities. The upgrade or retrofit existing facilities to improve accessibility or add multimodal components, such as complete street projects or the incorporation of transit-only vehicle lanes are eligible improvements in SMART SCALE. These type of improvements address safety and improve transit operations.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Transit	From all the meetings, discussions, and content from the SMART SCALE policy and technical guides, it appears that transit is intended to compete equally with highway and non-motorized project. However, there is a significant inequity built in against the ability of localities and regions to develop transit as a true mode choice	SMART SCALE ensures that project prioritization is based on project benefits, not on mode or technology. All projects, regardless of mode, are evaluated using the same measures and weights.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Transit	When transit and highway alternatives are presented as solutions to needs identified in VTrans2040, preference is built into Virginia's policy and processes for highways because transit is not given a true opportunity to compete. Namely this is because insufficient support exists at the state and federal levels for transit operations. It would be unwise to fund the asphalt or concrete portion of a roadway but not fund the contractor to build it. Yet that is what is done with transit when funding for a bus is available but not the funds for the operator. Millions of dollars are available to widen a roadway yet a fraction of that would not be available to pay for bus operations on that existing road. A fundamental shift needs to take place so that more money can be used for transit operations, if so desired by a locality or region. Little to no local funds are required to widen a road, yet operating buses to avoid the need to widen the road is a greater responsibility of the locality.	SMART SCALE is intended to provide funding for capital improvement, transportation demand management and safety projects. It is not intended to provide funding for state of good repair needs or operating assistance. Several Federal and State programs are available to provide financial assistance for operations of transit services. For example, the Urbanized Area Formula Funding program (49 U.S.C. 5307) makes Federal resources available to urbanized areas for transit capital and operating assistance. DRPT offers state match for transit operations. Transit agencies also receive fare box revenues. Availability of Federal and State funding sources ensures that transit operations continue to remain shared responsibility.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Transit	This concern relates to Section 2.2 Major Widening Projects. Widening costs a locality nothing, whereas added bus frequency does. Widening, and the resulting sprawl that inevitably comes with it, will always be preferred until the transit costs to localities is made equal to roadway improvements. Please consider amending SMART SCALE policies to address the lack of ease in transit qualifying for funds in comparison to highway and non-motorized projects.	SMART SCALE ensures that project prioritization is based on project benefits, not on mode or technology. Acquisition of additional vehicles to increase frequency of a bus route, if it meets all other policy and technical requirements of the SMART SCALE program, will be an eligible project.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	Transit	In the Technical Guide under Section 2.2, New Location Facilities, does this apply to new transit facilities, or just highway/roadway facilities? Is new property for transit facilities an eligible expense like right-of-way is for a roadway project? If this section is in fact only for roadways, please retitle it "New Location--Roadway Facilities".	Acquisition of right-of-way for transit facilities, if it meets all other policy and technical requirements of the SMART SCALE program, will be an eligible project expense.

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10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	VDOT assistance with applications	Section 2.2 of the draft SMART SCALE Technical Guide provides multiple planning requirements for a range of proposed project types. In keeping with previous SMART SCALE guidance emphasizing no need for outside consultants to assist applicants in application completion, we trust that VDOT staff will be available and responsive to the completion of these additional tasks—especially for any rural/small localities.	The applicant should coordinate with DRPT and/or VDOT district staff to determine the availability of resources to assist with the necessary documentation.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	VTRANS Needs	In conversations with other MPOs and at previous VAMPO meetings, there is a concern that the VTrans Needs Screening may contradict and/or supersede the long-range transportation process utilized by MPOs and mandated by the federal government. In the next VTrans, please ensure MPO LRTPs can feed into VTrans. This may result in MPO LRTP needs which may not be captured in VTrans, causing a disconnect between MPO and state LRTPs. We suggest coordination efforts between FHWA, FTA, OIPI, VDOT, DRPT and the MPOs to resolve any apparent conflicts.	Subsection A of § 33.2-353 of the Code of Virginia states: "The Board shall, with the assistance of the Office of Intermodal Planning and Investment, conduct a comprehensive review of statewide transportation needs in a Statewide Transportation Plan setting forth assessment of capacity needs for all corridors of statewide significance, regional networks, and improvements to promote urban development areas established pursuant to § 15.2-2223.1. In addition, subsection D states "It is the intent of the General Assembly that this plan assess transportation needs and assign priorities to projects on a statewide basis, avoiding the production of a plan that is an aggregation of local, district, regional, or modal plans."
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	VTRANS Needs	Regarding Section 2.3 Screening Process VTrans Needs Screening, it is confusing why there is a fourth and separate need category for "Transportation Safety Needs", when safety projects and issues are addressed through various needs outlined in the CoSS, UDA, or Regional Network needs. We would suggest removal of this need, as it is essentially already addressed in the other three needs.	The VTrans2040 Vision document highlights safety as one of the Commonwealth's key transportation goals and sets objectives for reducing motorized and non-motorized fatalities and severe injuries. The VMTP expands on the VTrans2040 efforts by identifying some of the Commonwealth's most pressing safety needs. This safety assessment is statewide, in nature, and while it does not offer specific recommendations, it does highlight crash trends and discusses modal conflicts.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Policy	VTRANS Needs	In Section 2.3 Screening Process VTrans Needs Screening, please provide more clarity on how Regional Networks are defined. Do they include all local roads in an urbanized area? From the MPO standpoint, federal RSTP funding does not allow projects on local roads.	It is most important to focus on the 'needs' identified, not the 'network' within which these needs assessment were generated. In that regard, all transportation infrastructure with the defined regional network boundaries are included in the regional network analysis. The regional network analysis area is defined as the MPO boundary, with the stipulation that if an MPO boundary includes only a portion of a county, the entire county will be included in the needs analysis area. All of the transportation infrastructure, their function and relationship to the regional economy were considered when developing the regional profile. With respect to SMART SCALE project nominations, only those facilities that can address a need defined in the VMTP Needs Assessment will be scored in the prioritization process. For a project to meet a Regional Network Need, the project sponsor will need to provide a logical connection between the purpose of the project and how it will help meet a need in the Regional Network Needs Assessment. More information on the identified needs can be found here http://vtrans.org/vtrans_multimodal_transportation_plan_2025_needs_assessment.asp . While there are constraints on federal RSTP, SMART SCALE funding may be used for any eligible project.

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8/11/2017	email to DPRPT	Jina S. Freiburg	City of Falls Church	NOVA	Policy	Weighting	State, Regional and Local plans show a high level of consistency in planning goals, including economic development, connections with land use planning, multimodal solutions, and safety. Changes to the weighting framework for Smart Scale should align with planning goals that emphasize economic development, accessibility and safety.	For Northern Virginia, the Code of Virginia requires congestion mitigation to be weighted highest. Suggestions for changes to the weighting framework to Area Type A should be submitted to the CTB for future consideration.
9/11/2017	Letter to Secretary Layne	Patrick Mauney	Rappahannock Rapidan Regional Commission	Culpeper	Policy	Weighting	RRRC Placement – The Regional Commission is currently placed in Category C and formally requests to be placed in Category D. Based on the region’s desire to emphasize safety and economic development, and on the region’s lack of an urban core and overall rural character, the Regional Commission believes that Category D is the proper placement for the region. In 2015, the Regional Commission was moved to Category C. However, at the time of the category adjustment, the weighting factors associated with Category C were also adjusted, and we now request the placement in Category D to more closely match the original request in 2015.	The requested area type change by RRRC was approved by the Board at the October meeting. The SMART SCALE team has updated the appropriate documentation with this change.
6/22/2017	Email to the Portal	Paul Agnello	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Process	Analysis	Showing the Mean Average and the Median Average project cost adjusted for inflation for each scenario would be helpful. The period from the FY 2006 to 2011 SYIP to Round 1 of Smart Scale is 11 years and for Round 2 of Smart Scale is 12 years and a direct comparison does not account for inflation. The analysis should be adjusted for inflation between FY 2006 and FY 2018.	This will be taken into consideration for future analyses.
10/18/2017	Email to the Portal	Joe Vidunas	Hanover County	Richmond	Process	Application Screening	Sec. 2.3 Screening Process Needs as described in VTrans are purposefully broad and not project specific in order to allow a range of transportation solutions. We request flexibility on project submission and during the screening process in order to present projects with supporting information that meet a regional network need. Many needs not specifically referenced in VTrans may be shown to provide a regional benefit in support of VTrans goals.	The VTrans Screening team reviews each project to assess if the project meets an identified need. It is important for the applicant to provide justification on how the project meets specific needs. Applicants will be able to submit pre-applications for pre-screening to receive feedback.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	Cost Analysis Skews Scores	HB 2’s intent was to identify and invest in projects that make the greatest difference, not simply those that are less expensive - the current SMART SCALE cost computation favors/awards out of proportion scores to low cost projects that benefit the fewest number of people and works against higher cost projects that benefit more people. If project cost is to be used with larger Northern Virginia projects, the traffic delay, lost time, lost jobs and impaired quality of life costs of not building the project should also be calculated. - While spending a little money in a lot of places benefits more public officials, focusing more dollars on projects that move the most people and relieve the biggest choke points benefits more people and does more to help the state’s economy and overall transportation network. - This is not just about dollars but principle and precedent. Rankings showing bus shelters on Falls Church’s Broad Street or largely residential Park Ave represent the Commonwealth’s “smartest transportation investments” seriously undermine Smart Scale’s credibility and public confidence	The SMART SCALE team assessed the perception of a Low Cost Bias and found that there are fewer smaller projects when compared to prior SYIPs, but also concluded that through SMART SCALE, not only are we funding more projects with a total cost greater than \$50M, we are now fully funding them ensuring their timely delivery.

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10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	FY18 Project Selection	Concerned that the prioritization process results in selection of projects that are essentially local level responsibility, i.e. Broad Street and Park Avenue multi-modal improvements (Falls Church), Backlick Run Trail (Alexandria), Potomac Town Center Parking Garage (Prince William), Ballston/Rosslyn Corridor Multi-modal improvements (Arlington), East Elden Street widening (Herndon).	Analysis of selected projects determined that the number of small versus large projects appears consistent with pre-SMART SCALE SYIPs. Further, the process is specifically designed to evaluate projects that meet needs at local (urban development areas), regional (regional network), and statewide (Corridors of Statewide Significance) levels using the same core factors. Regardless of responsibility, all selected projects meet a need identified in the statewide needs assessment and provide benefits related to Safety, Congestion, Accessibility, Environment, Economic Development and/or Land Use.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	General	The Alliance has advocated setting aside some state and regional funds for future major needs as opposed to spending every available dollar every year on many projects that fall far short of being true regional or state priorities	This comment has been shared with the Commonwealth Transportation Board.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	General	The Alliance applauds Hampton Roads to committing its regional dollars over time to a Hampton Roads Bridge Tunnel third tube and has urged the Northern Virginia Transportation Authority to do the same with some of its regional revenue. For example, two years of regional revenues could fund a Bi-County or Tri-County Parkway or significantly improve the Route 1 corridor or address other major needs.	none needed
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	Inadequate Project Selection	Given that the CTB, VDOT, and DRPT have primary responsibility for the performance of the Commonwealth's transportation network, the Alliance continues to be concerned that the administration has chosen to diminish their Smart Scale Project selection role, particularly in view of the fact that HB2 did not direct or envision such a diminished role. Additionally, the Alliance is concerned with the current bottom-up, local governmental nomination process that lacks big picture perspective. Fundamental needs require greater state input and championing. The	In December 2015, the CTB approved the statewide needs assessment which forms the basis for projects eligible to be submitted through SMART SCALE. All projects (regardless of who submits) must demonstrate that they meet a need identified in the statewide needs assessment (VTrans). The SMART SCALE prioritization process recognizes that there are many needs impacting both local, regional and statewide needs. VDOT and DRPT work in partnership with eligible entities to identify and develop projects for funding consideration. It is the role of the CTB to assess needs on a statewide basis and potentially select investments they deem best for the commonwealth, regardless of their rank. As noted by the Alliance, the Code of Virginia does not require the CTB to allocate funds to the highest-scoring project(s), however, this process increases transparency and accountability in the selection of projects for funding should the Board deviate from the order of ranked projects. In addition, the CTB may submit up to 2 projects per cycle in the event a high priority project was not submitted.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	Inadequate Project Selection	The Alliance believes that by evaluating and allocating funds primarily for projects nominated by local governments (including bike paths, bus shelters, and trails), Smart Scale is not evaluating all projects of potential greatest regional statewide significance. Thus scarce state transportation funds are expended annually on projects that may well not meet the most important regional and statewide needs.	VDOT and DRPT work in partnership with eligible entities to identify and develop projects for funding consideration. It is the role of the CTB to assess needs on a statewide basis and potentially select investments they deem best for the commonwealth, regardless of their rank. As noted by the Alliance, the Code of Virginia does not require the CTB to allocate funds to the highest-scoring project(s), however, this process increases transparency and accountability in the selection of projects for funding should the Board deviate from the order of ranked projects. In addition, the CTB may submit up to 2 projects per cycle in the event a high priority project was not submitted.

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10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Process	Missing Links Merit High Priority	A quick glance at a map shows Northern Virginia 's two most obvious major transportation deficiencies are the lack of north-south connectivity west of Dulles Airport and the lack of Potomac River crossing capacity . Both must be primary state priorities moving forward, not based on just data, but on common sense and obvious need. Neither has been evaluated.	The CTB has determined through its policy that projects must be sufficiently developed in order to calculate the benefits. In order to advance, projects must have considered alternatives and in some cases the NEPA study must have reached a point where the preferred alternative has been identified or is forthcoming. Additionally, applications must be submitted by local, regional, or transit organizations.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Richmond	Process	Multimodal Funding Share	We are pleased to see that many cost-effective, multimodal -i.e. transit, rail, bicycle and pedestrian projects scored well and were recommended for funding in the first two rounds of SMART SCALE. Nevertheless, we remain concerned that these modes have made up such a small share of overall funding recommended thus far under SMART SCALE, which has continued to overwhelmingly emphasize highway projects. In part, this reflects the fact that while many small-scale multimodal projects have been recommended for funding, very few large-scale multimodal projects have been on the list	Many large scale highway projects include bicycle and pedestrian improvements as well. The analyses completed have been based on the selected improvement type and not features that are included as part of the project.
9/11/2017	Verbal Comment	Jim Crozier	Orange County	Culpeper	Process	Project	Pleased that the Route 601 curve realignment project was added to the final list of approved projects in Round 2. Concerned that the I-95 Express Lanes Extension was funded through SMART SCALE -- thinks it should have been a P3 -- takes too much of the SMART SCALE pot.	The extension of the I-95 express lanes in Fredericksburg was not funded through SMART SCALE. Virginia submitted an application to USDOT's FASTLANE grant program. The package included a number of highway, rail and technology investments along the I-95 corridor. Existing projects as well as private (P3) funding was leveraged to create a compelling and ultimately successful grant application. Virginia was awarded \$165 million dollars through the federal FASTLANE grant.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Process	Resolution of Support	Can the resolution of support be submitted after August 1st?	No. In Rounds 1 and 2 a grace period was provided and applicants had until December 1st to submit required resolutions of support. Now that process is established and there is a 2 year window between Round 2 and Round 3, and resolutions of support be uploaded with submitted applications by the August 1st submission deadline.
9/28/2017	Email to the Portal	Douglass L. Stegall		Salem	Request	Road Improvement	Henry Co. I was told they are paving from Salem to the N.C. line. The dangerous curve at Drapers Florist in Bassett, on rt 220 north. Many Truck have overturned, it is banked the wrong way. I mean a ton of wrecks. Can they improve this while doing the paving and save the taxpayers money and save lives. It is the most dangerous spot in Henry County.	The Virginia Department of Transportation is funding and leading the development of corridor study along Route 220. This study will focus on ways to improve safety and traffic flow along the corridor. There will be opportunities in the near future for the public to provide input on the challenges and potential solutions. The ultimate goal is to create a list of projects that can be submitted for funding consideration.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Accessibility	Methodology changes	The City does not support the proposed change to calculate accessibility to jobs by mode for auto and transit using the pedestrian network in the calculation of transit accessibility. The City supports calculating accessibility to jobs by mode for auto, transit, pedestrian, and bicycle modes. This change supports accessibility and an integrated and multimodal transportation system.	There are no proposed changes to the access to jobs methodology. As in previous rounds the method to calculate job access for the transit mode included an estimate of walk time and distance from beginning and end of the transit stop (rail or bus) to ensure jobs in an around transit stops are captured.
9/22/2017	Letter to Mr. Whitworth	Rick Chandler	Harrisonburg Rockingham Metropolitan Planning Organization	Staunton	Accessibility	Methodology changes	Support proposed changes	none needed

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10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Accessibility	Methodology changes	The Alliance believes more information is needed to evaluate the methodology proposed to weight jobs based on travel time. However the Alliance observes that Northern Virginia's economy is based to a large degree on its ability to attract employment skills from a broad geographic area. A methodology that results in more weight assigned to projects adjacent to large job concentrations than project investments improved to make those concentration/activity centers more accessible to a wider area of job seekers would be counter productive. In short the benefit of and rationale for this proposed change are not clear.	At the September CTB meeting the CTB expressed their intent to retain the 45 and 60-minute caps for the calculation of accessibility. This adjustment has been updated in the SMART SCALE Technical Guide. The decay curve used in this measure's methodology to weight jobs based on travel time reflects national and state travel survey data that demonstrates the longer the travel time to a job the fewer people would be willing to travel to that job.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Accessibility	Mixed Use	Please provide Commonwealth's definition of 'mixed-use'	To qualify as mixed use a site or parcel must be designated in the locality's current or future zoning map as mixed use zoning or be located within a designated mixed-use zoning district, which allows for a range of land uses (residential, commercial, cultural, institutional, and/or industrial) in a single development project.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Accessibility	Multimodal choices	Shifting to the measure on access to multimodal choices, a few tweaks may be needed to make sure that this measure adequately encompasses multimodal project types, and that the focus remains on awarding points for projects that actually feature multimodal elements. We recommend clarifying that the highest point category covers "transit system or passenger rail improvements," since rail projects are also critical to the Commonwealth's multimodal network yet are not currently mentioned in any point category for this measure. We are also concerned that the highest point category currently awards projects that would simply "reduce delay on a roadway with a scheduled peak service of 1 transit vehicle per hour." This criterion does not seem appropriate for the top echelon of multimodal points, since many projects with no multimodal elements at all (such as road widening projects) are likely to clear this low bar. We suggest separating this element out as a lower point criterion, similar to the approach used for the air quality measure under Environmental Quality.	As noted, the Access to Multimodal Choices criteria gives the highest number of points(5) to transit system improvements or to roadway improvements that will benefit fixed-route transit by reducing delay. We agree that the transit system improvements could include passenger rail improvements (e.g. VRE capacity improvements) but do not feel that the language is restrictive as written. Regarding roadway improvements on roads with at least one vehicle per hour, the points received in Table 8.2 are scaled by the number of new non-SOV trips, so a roadway improvement that does not increase transit or carpooling trips will not receive credit under the A.3 measure. The SMART SCALE team continues to assess options to ensure projects are fairly analyzed and the results "make sense" and can consider your suggestions for Round 4.
10/19/2017	Email to the Portal	Joe C. Bonanno	West Piedmont Planning District Commission/Danville MPO	Salem	Accessibility	Multi-use trail as ped accommodation	In Tables 8.2 and 9.2 on page 65 and 67, respectively, please consider including multi-use trails (or similar terminology) within the pedestrian facilities project type, as multi-use trails could potentially serve as effective travel conveyances between park & ride lots and transit stations or activity centers, for example.	Though not specifically mentioned, a multi-use trail would qualify as a pedestrian facility.
9/11/2017	Letter to Secretary Layne	Patrick Mauney	Rappahannock Rapidan Regional Commission	Culpeper	Accessibility	Time Caps for Auto and Transit	Accessibility criteria – The Regional Commission supports the removal of the 45- and 60-minute caps for auto and transit job access. More than 50% of our region's workers commute to jobs outside the region and we requested similar changes to the criteria in 2015.	At the September Board meeting the CTB has expressed desire to retain the 45 and 60 minute caps for auto and transit access.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Accessibility	Time Caps for Auto and Transit	There was concern regarding the removal of the 45 and 60 minute cap for auto and transit accessibility as it was felt that it would negatively impact the localities land use policies to encourage shorter commute trips particularly in urban areas. -Better understanding of how the removal of cap will change the accessibility score outcome for projects of various modes autos, transit, bike/ped.	At the September Board meeting the CTB has expressed desire to retain the 45 and 60 minute caps for auto and transit access. The SMART SCALE Technical Guide has been updated to reflect this.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Accessibility	Time Caps for Auto and Transit	Change eliminates time caps for transit (60 minutes) and autos (45 minutes). Request Clarification from VDOT/DRPT •Could negatively impact land use policies by crediting longer distance travel	At the September Board meeting the CTB has expressed desire to retain the 45 and 60 minute caps for auto and transit access.

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10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Accessibility	Time Caps for Auto and Transit	We also support staff's recent suggestion to reinstate the 45- and 60-minute caps in measuring access to jobs under the Accessibility category (Appendix C). Understanding that the decay curve function used in this analysis serves to reduce point values as you get farther from a project, the 45-minute (auto) and 60-minute (transit) caps applied in previous rounds still seem to be reasonable cutoffs for this analysis to help ensure the process is not rewarding projects that encourage sprawl—an outcome that would cut against many of the Commonwealth's transportation, land use, and environmental goals.	none needed
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Accessibility	Time Caps for Auto and Transit	The City does not support the elimination of 45-60 minute caps for auto and transit job access. This change would encourage longer distance trips.	At the September Board meeting the CTB has expressed desire to retain the 45 and 60 minute caps for auto and transit access.
10/16/2017	Letter to Secretary Layne	Tim McLaughlin	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Accessibility	Time Caps for Auto and Transit	FAMPO does not support the restoration of the time caps for auto and transit as Fredericksburg and Northern Virginia areas have significantly longer average commute times than the rest of the state. FAMPO recommends that due to the different characteristics for Fredericksburg and Northern Virginia that they should have their own unique decay curves or one for both areas and the 45 and 60 minutes caps for auto and transit trips should be removed statewide.	At the September CTB meeting the CTB expressed an intention to retain the 45 and 60-minute caps for the calculation of accessibility. The 2017 SMART SCALE Technical Guide has been revised to reflect this change.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Accessibility	Time Caps for Auto and Transit	Supports retaining current caps. investing in projects that facilitate shorter commutes will further the goal of moving more people in the most cost effective manner.	At the September CTB meeting the CTB expressed their intent to retain the 45 and 60-minute caps for the calculation of accessibility. This adjustment has been updated in the SMART SCALE Technical Guide.
6/22/2017	Email to Portal	Paul Agnello	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Congestion	Analysis Year	Consider updating Congestion Analysis year from 2025 to 2030	At the September CTB meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Congestion	Current vs. Future	Under the Congestion Mitigation category (Appendix B), we support the recently proposed change to evaluate person throughput and person hours of delay based on existing year traffic volumes, rather than future projections. This change is prudent, given both existing funding constraints and the considerable uncertainty involved in projecting future traffic conditions. Past projections have often been far higher than the reality, which can lead to planning more expansive and costly infrastructure than necessary to meet actual needs	none needed
10/10/2017	Letter to Mr. Whitworth	Jim Baker	City of Harrisonburg	Staunton	Congestion	Current vs. Future	The City questions the proposed change from future traffic to current traffic as all the planning documents are based on forecasted conditions and ultimate project selection is based on this criterion. If scored on existing conditions, then projects that may be truly needed in 4-6 years will be forced to be delayed until the predicted congestion is experienced. The City requests the CTB to consider reinstating the original measure. Additionally the City supports a weighted measure that looks at both current and future congestion.	At the September Board meeting the CTB has expressed desire to use current day traffic in the calculation of congestion benefits for SMART SCALE. The SMART SCALE Technical Guide has been revised to reflect this change.

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10/18/2017	Email to the Portal	Joe Vidunas	Hanover County	Richmond	Congestion	Current vs. Future	Sec. 7.0, Appendix B: Congestion Mitigation Measures We do not believe the proposed change from future to existing peak period traffic volumes to compute Person Throughput will serve the best public purpose in all instances. We believe there should be flexibility to provide traffic projections from existing and approved zonings so that these emerging problems can be considered. All projects require a design that is based on future traffic projections to ensure longer term wise use of limited resources.	This comment has been shared with the Commonwealth Transportation Board. However, at the September CTB meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.
10/19/2017	Letter to Mr. Whitworth	John Willingham	WinFred Metropolitan Planning Organization	Staunton	Congestion	Current vs. Future	The model should include both current day and forecasted demand in measuring congestion to encourage pro-active planning in rapidly growing areas like Winchester and Frederick County. Projects typically programmed in the out years (years five and six), scoped to address current congestion, may be functionally obsolete upon start of preliminary engineering. Allowing the inclusion of forecasted demand will ensure a more effective and efficient use of limited engineering dollars.	Based on a discussion with the CTB at the September meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Congestion	Current vs. Future	Benefits for some projects may have a longer benefit time frame and are designed to meet traffic demands 20 years beyond their completion date. Suggest including a factor that could also utilize later year traffic projections to include "life-cycle" benefits	Based on a discussion with the CTB at the September meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems.
10/18/2017	Letter to Secretary Layne	Barbara Nelson	Richmond Regional Transportation Planning Organization	Richmond	Congestion	Current vs. Future	The RRTPO recommends that the scoring method for C.1 and C.2 remain unchanged from previous SMART SCALE cycles. The potential impacts of the revisions have not been fully vetted by the CTB. Based on remarks by the Deputy Secretary, the motivation for this revision is based on comments received before the close of the public comment period. The RRTPO believed that growing localities and regions that have traditionally planned well for mitigating congestion should not be put at a long-term competitive disadvantage for funding because they have less traffic today.	Based on a discussion with the CTB at the September meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.
10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Congestion	Data source for congestion mitigation	In the SMART SCALE Technical Guide under Appendix B: Congestion Mitigation Measures, Measures Approach, Data Source(s)/Analytical Tools, please state the data source used by DRPT to provide estimated daily and hourly ridership	Applicants are requested to provide estimated daily and hourly ridership numbers. OIPI and DRPT have also relied on available research and other professional methods to estimate daily and hourly ridership numbers if they are unavailable or are difficult to calculate using the traditional methods.

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9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Congestion	Methodology changes	<p>Since congestion factor has the highest weight for NoVA better understanding of the metric and its implications to all modes is required prior to the change. The technical guide notes that proposed changes to this measure are still being evaluated.</p> <p>-One suggestion was to use person miles travelled versus throughput.</p> <p>-Another suggestion to account for the length of the project was to use the life-cycle benefits of the projects. Since larger projects deliver benefits over a longer period of time versus smaller projects, life-cycle benefit computation would account for the length of the project. Major projects are designed based on traffic projections for 20 years.</p>	<p>There were two proposed changes to the Congestion Mitigation measure.</p> <p>For the first, at the September CTB meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.</p> <p>For the second, the SMART SCALE team has continued to assess options to scale the measure to the size of the project and to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.</p>
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Congestion	Methodology changes	The Alliance believes more information is needed as to the methodology proposed for this change	This comment has been shared with the Commonwealth Transportation Board. However, at the September CTB meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.
10/18/2017	Email to the Portal	Sarah Rhodes	Richmond Regional	Richmond	Congestion	Methodology changes	Congestion Mitigation Measures revises congestion mitigation factor, but does not justify a change from the former approach. Please provide details on the revised measure, and the process or evaluation used to justify the proposed revision.	<p>There were two proposed changes to the Congestion Mitigation measure.</p> <p>For the first, at the September CTB meeting, it was determined that the congestion mitigation score should be revised to utilize traffic volumes for existing conditions. This is a change to the person throughput and person hours of delay measures used in the first two rounds of SMART SCALE funding, which were based on future traffic conditions. The purpose of this change recognizes that investments should be focused on current congestion problems rather than on potential future problems. The SMART SCALE Technical Guide has been revised to reflect this change.</p> <p>For the second, the SMART SCALE team has continued to assess options to scale the measure to the size of the project and to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure should remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.</p>

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Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Congestion	Scaling Throughput	For the proposed change in congestion measure to person throughput miles there was concern about how the measure would be computed for projects such as intersection improvements. Length of the project doesn't always correlate to its effectiveness. How will the measure be computed for transit projects and TDM projects? Will these types of projects be evaluated fairly?	The SMART SCALE team has continued to assess options to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Congestion	Scaling Throughput	<ul style="list-style-type: none"> Proposed change from person throughput to person miles traveled. Potential impact to transit scores. Request clarification from VDOT/DRPT. 	The SMART SCALE team has continued to assess options to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Congestion	Scaling Throughput	City does not support changes to scale person throughput measure based on corridor length. Change could negatively impact transit projects. City requests the criteria be analyzed further to prevent unintended consequences to transit and other non-SOV solutions.	The SMART SCALE team has continued to assess options to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure should remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Congestion	Scaling Throughput	The Alliance believes that the rationale for adjusting person throughput calculation for size of project not clear.	The SMART SCALE team has continued to assess options to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure should remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Congestion	Scaling Throughput	The length of a project does not always correlate to its effectiveness in mitigating congestion. Targeted and strategic improvements can be just as effective. Need more information to understand.	The SMART SCALE team has continued to assess options to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis is warranted and the CTB agreed that this measure should remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.
6/22/2017	Email to the Portal	Paul Agnello	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Congestion	Weekday vs. Weekend	Weekend traffic should be considered in congestion analysis. Weekend interstate traffic causing traffic congestion is a major issue for I-64 between Hampton Roads & Richmond, I-95 between Richmond and DC, and I-81 in VA, so it is broader issue than just the Fredericksburg area	The current congestion metrics focus on peak periods. This is the time of day with the highest levels of congestion as well as available information for accurate analysis. At this time the data necessary to model and analyze impacts is not available in most areas for times outside of weekday peak-periods. Neither VDOT nor any of the MPOs in Virginia have created or maintained weekend or seasonal travel demand models.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Congestion	Weighting	The Alliance continues to believe a minimum of 60 points should be awarded to Northern Virginia and Hampton road projects that significantly reduce congestion. Given that reducing congestion improves accessibility, safety, air quality and economic development prospects, weights for these measures could be reduced or eliminated.	The SMART SCALE team conducted sensitivity testing for different weighting scenarios and, while the weights have an impact on the scores, the measures and amount of funding requested appear to have greater influence over whether a project is funded than the weighting frameworks. As a result of the analysis, no changes were proposed.

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10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Congestion/Economic Development	Scaling	Another change being considered for measures in both the Congestion Mitigation and Economic Development categories is to scale project benefits based on the length of a proposed project. While it makes sense to account for the relative benefits a project will provide, it seems that scaling based on project length could create a perverse incentive to propose projects that are more expansive and more destructive than necessary to meet the relevant transportation need. It is also unclear how such a change would be applied to the various project types submitted each round under SMART SCALE, which is particularly important since interchange upgrades and other spot improvements are often more effective than lengthier projects in improving traffic conditions. We urge you to keep the existing methods for scoring these measures rather than adopting this new scaling approach.	The SMART SCALE team has continued to assess options to ensure projects are fairly analyzed and the results "make sense". While certain options seem promising, additional analysis for scaling the Congestion Mitigation measure is warranted and the CTB agreed that this measure should remain unchanged at this time. The team will continue to assess options and will recommend changes for Round 4, if warranted.
6/22/2017	Email to the Portal	Paul Agnello	Fredericksburg Area Metropolitan Planning Organization	Fredericksburg	Economic Development	Buffer zones	A max buffer size of 3 miles is not very big for a large Statewide High Priority project, but may be generous for a small local District Grant project. The tiered approach of 1, 3, & 5 miles in Round 2 appears better than the proposed change.	'Project Support for Economic Development' measure is not intended to capture broader, macro-economic impacts of projects such as productivity gains or access to labor markets. Measures such as those are essentially measures of congestion. As there is already a congestion factor area with two congestion metrics, the Board decided to use different metrics to evaluate the economic development impacts of projects. The 'Project Support for Economic Development' is intended to evaluate the degree to which a project may help directly support commercial and industrial growth. The SMART SCALE team has recommended reducing the 'influence area' for all three project tiers with a maximum 'influence area' of 3-miles for Tier 3 projects.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Economic Development	Buffer Zones	Concern regarding reducing the buffer area for the project to 3 miles. Consider scaling impacts for larger developments to a larger area.	'Project Support for Economic Development' measure is not intended to capture broader, macro-economic impacts of projects such as productivity gains or access to labor markets. Measures such as those are essentially measures of congestion. As there is already a congestion factor area with two congestion metrics the Board decided to use different metrics to evaluate the economic development impacts of projects. The 'Project Support for Economic Development' is intended to evaluate the degree to which a project may help directly support commercial and industrial growth. The SMART SCALE team have recommended reducing the 'influence area' for all three project tiers with a maximum 'influence area' of 3-miles for Tier 3 projects.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Economic Development	Buffer Zones	Opposed to reducing buffers	This comment has been provided to the CTB.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Economic Development	Consistency with local plans	As a strong supporter of the Commonwealth's Corridors of Statewide Significance that requires projects of statewide significance be shown on local plans, the Alliance supports this provision as long as it is interpreted as being consistent with that policy and not as an incentive for jurisdictions to remove such projects from local plans in order to disqualify them from Smart Scale funding.	Chapter 729 of the 2012 Acts of Assembly amended § 33.2-214 and §15.2-2223, requires a locality's comprehensive plan be consistent with: - The statewide transportation plan (VTrans); - Significant new, improved, or relocated highway projects in the Six-Year Improvement Program; or - Route locations selected by the Commonwealth Transportation Board.

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9/11/2017	Letter to Secretary Layne	Patrick Mauney	Rappahannock Rapidan Regional Commission	Culpeper	Economic Development	Economic Distress	Economic Development criteria – The Regional Commission does not support the additional 0.5 point available for economically distressed areas. Should that measure be included, the Regional Commission requests that the measure be scored on a sliding scale, such as the Economic Innovation Group indicator presented to the Commonwealth Transportation Board in June.	The proposed economic distress measure as approved by the CTB at the October meeting will be applied on a sliding scale. A project in a zip code with a distress value of 100 would receive the full 0.5 point. A project in zip code with a distress value of 50 would receive 0.25 points, etc.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Economic Development	Economic Distress	Concerns on providing points based economic distress based on zip codes. Zip codes straddle diverse income levels. -Revitalization projects in economically distressed part/zip code of the County should be eligible for such credit, whether or not the area around it, as a whole is distressed; as such projects are often part of community revitalization efforts to spur economic development.	Zip codes were the smallest area with data available for economic distress indicators.
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Economic Development	Economic Distress	Depending on how it is applied, we have some concerns that the proposed new economic distress measure under the Economic Development category (Appendix E) could encourage unnecessary highway construction and sprawl in rural areas. If this measure is adopted, we support staff's recent shift from determining "economic distress" at a county level to doing so by ZIP code, and we encourage you to continue to develop options to make this measure more fine grained. This is particularly important to help ensure that economically-distressed parts of urban areas are not overlooked on account of being averaged with more affluent areas nearby.	The CTB has adopted the change to include additional points for economic distress using the zip code level data. VDOT/DRPT researched multiple sources of information to determine the appropriate data set for economic indicators. Most data sets report at the jurisdiction level of counties and cities. Jurisdiction-level stress indicators can mask economically distressed areas within a particular jurisdiction. The data set provided through the Economic Innovation Group Distressed Communities Index (http://eig.org/dci) provides data at a more granular level tied to zip codes and is based on seven areas. Evaluation of economic distress at the zip code level was deemed more reliable than at the jurisdiction level and the seven referenced factors appeared appropriate. The SMART SCALE team continues to assess options to ensure projects are fairly analyzed and the results "make sense".
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Economic Development	Economic Distress	The Alliance believes that transportation investments submitted from economically distressed areas on the basis that they will enhance economic development should be accompanied by documentation that there is a high level of likelihood that such expenditures will materially improve that area's economy.	At the CTB's direction, VDOT/DRPT researched multiple sources of information to determine the appropriate data set for economic indicators. Most data sets report at the jurisdiction level of counties and cities. Jurisdiction-level stress indicators can mask economically distressed areas within a particular jurisdiction. The data set provided through the Economic Innovation Group Distressed Communities Index (http://eig.org/dci) provides data at a more granular level tied to zip codes and is based on seven areas. Evaluation of economic distress at the zip code level was deemed more reliable than at the jurisdiction level and the seven referenced factors appeared appropriate. As we assess how this worked after Round 3, additional adjustments to this methodology may be appropriate.
10/19/2017	Letter to Secretary Layne	Megan Cronise	Roanoke County Department of Community Development	Salem	Economic Development	Economic distress	We agree with the use of zip code level economic distress indicators	none needed
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Economic Development	Economic distress	Concerns about providing points based on economically distress, based on zip codes. Projects in an economically distressed part of a locality/zip should also be eligible for credit, whether or not the area around it as a whole is distressed. If economically distressed areas are to be considered extra credit, factors such as the number of students receiving free or reduced lunch should also be considered.	VDOT/DRPT researched multiple sources of information to determine the appropriate data set for economic indicators. Most data sets report at the jurisdiction level of counties and cities. Jurisdiction-level stress indicators can mask economically distressed areas within a particular jurisdiction. The data set provided through the Economic Innovation Group Distressed Communities Index (http://eig.org/dci) provides data at a more granular level tied to zip codes and is based on seven areas. Evaluation of economic distress at the zip code level was deemed more reliable than at the jurisdiction level and the seven referenced factors appeared appropriate.

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10/20/2017	Letter to Secretary Layne	Bryan Hill	Roanoke Valley Transportation Planning Organization	Salem	Economic Development	Economic distress	In the determination of economically distressed areas, the Economic Innovation Group's Distressed Communities Index is proposed. We would suggest utilizing public, apolitical entities as the source of this data (Appalachian Regional Commission – for Appalachian Virginia, Department of Housing and Community Development, VA Economic Development Partnership, etc.). At a minimum, a clearer understanding of the approach and methodology employed would be greatly appreciated	VDOT/DRPT researched multiple sources of information to determine the appropriate data set for economic indicators. Most data sets report at the jurisdiction level of counties and cities. Jurisdiction-level stress indicators can mask economically distressed areas within a particular jurisdiction. The data set provided through the Economic Innovation Group Distressed Communities Index (http://eig.org/dci) provides data at a more granular level tied to zip codes and is based on seven areas. Evaluation of economic distress at the zip code level was deemed more reliable than at the jurisdiction level and the seven referenced factors appeared appropriate.
10/19/2017	Email to the Portal	Joe C. Bonanno	West Piedmont Planning District Commission/Danville MPO	Salem	Economic Development	Local Comp Plan	Within Appendix E, Economic Development Measures, it is noted that a project application will receive 0.5 point if the project is specifically referenced in a comprehensive plan, local economic development strategy, or regional economic development strategy. Some of the localities in our region have comprehensive plans which are somewhat dated and may not specifically include an eligible project, yet may note a need for certain actions that the project may fulfill. Therefore, we ask that this measure be revised to once again include projects that are "consistent with" language within these plans and award a smaller value, say 0.25 point rather than 0.5 point for references "consistent with" the project.	There is considerable time between now and the time of the application due date of August 1, 2018 for Round 3. We encourage local governments to identify any updates that may be needed to local comprehensive plans and/or regional economic development strategies to ensure they can benefit from the extra 0.5 point.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Economic Development	New vs. Future Sites	Shift from assessing the ability of the project to support "new and existing economic development" to only "future economic development". Are only new developments eligible? How will development be considered?	The change from "new and existing" to "future" was an attempt to provide clarity rather than a proposed change in methodology. There is no proposed change to which developments may be considered; both redevelopment and greenfield development are eligible for consideration. As in previous rounds of SMART SCALE, existing developments with occupancy permits issued prior to the application deadline are not eligible. The objective of the revisions to this measure are to better assess the readiness of proposed sites that the proposed transportation project will benefit.
9/7/2017	Provided to District	Yon Lambert	City of Alexandria	NOVA	Economic Development	New vs. Future sites	Removal of "any existing" clause implies only new economic development . •Does redevelopment meet the definition of 'new'? •Concern this could reduce overall project scores since majority of economic development projects in Alexandria are redevelopment.	The change from "new and existing" to "future" was an attempt to provide clarity rather than a proposed change in methodology. There is no proposed change to which developments may be considered; both redevelopment and greenfield development are eligible for consideration. As in previous round of SMART SCALE, existing developments with occupancy permits issued prior to the application deadline are not eligible. The objective of the revisions to this measure are to better assess the readiness of proposed sites that the proposed transportation project will benefit.
10/18/2017	Letter to Secretary Layne	Barbara Nelson	Richmond Regional Transportation Planning Organization		Economic Development	New vs. Future sites	The RRPTO recommends that the scoring method for ED. 1 remain unchanged from previous SMART SCALE cycles. The potential impacts of the revision have not been fully vetted by the CTB. Based on remarks by the Deputy Secretary, the motivation for this revision seems to be process-level concerns of obtaining supporting documentation for future development proposals, and accurately scoring such future development. Rather than remove future development form consideration, a recommended interim step would be to clearly define the supporting documentation required to demonstrate progress on economic development proposals and planning efforts.	The change from "new and existing" to "future" was an attempt to provide clarity rather than a proposed change in methodology. There is no proposed change to which developments may be considered; both redevelopment and greenfield development are eligible for consideration. As in previous round of SMART SCALE, existing developments with occupancy permits issued prior to the application deadline are not eligible. The objective of the revisions to this measure are to better assess the readiness of proposed sites that the proposed transportation project will benefit.

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Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
10/20/2017	Letter to Secretary Layne	Phyllis Randall	Loudoun County Board of Supervisors	NOVA	Economic Development	New vs. Future Sites	The CTB should continue to include "existing developments" in the scoring of economic development measures. Existing businesses actually stimulate new economic growth and keep vitality within commercial areas. Loudoun's Board feels that removing this evaluation factor may run counter to the State's goal of actually attracting new economic development. Additionally, this proposed change increased the difficulty for retaining existing businesses that support the state, regional and local economies. The Board believes most local governments' likely share our concerns with respect to this proposed change.	The change from "new and existing" to "future" was an attempt to provide clarity rather than a proposed change in methodology. There is no proposed change to which developments may be considered; both redevelopment and greenfield development are eligible for consideration. As in previous round of SMART SCALE, existing developments with occupancy permits issued prior to the application deadline are not eligible. The objective of the revisions to this measure are to better assess the readiness of proposed sites that the proposed transportation project will benefit.
10/20/2017	Letter to Secretary Layne	John Budesky	Goochland County	Richmond	Economic Development	New vs. Future Sites	The county recommends that the scoring methodology for ED.1 remain unchanged from previous SMART SCALE cycles. Potential impacts of the revision have not been fully vetted by the CTB. Based on remarks by the Deputy Secretary, the motivation for this revision appears to be a process related concern about obtaining support documentation for future development proposals and accurately scoring such proposals. Rather than remove future development from consideration, an interim step would be to more clearly define the supporting documentation required to demonstrate progress economic development proposals and planning efforts.	Future development will still be considered; only zoned-only sites without direct access or directly adjacent to the proposed transportation project will be excluded. For this round, additional points will be awarded based on how far along a site development is in the land development process. A site with a detailed site plan is weighted higher than a site with a conceptual site plan. Applicants are not required to have detailed site plans to qualify. The objective of the revisions to this measure is to better assess the readiness of proposed sites that the proposed transportation project will benefit.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Economic Development	Primary Access	Provide clear definition on primary access to the site	To qualify as primary access to site the proposed site or parcel needs to be adjacent to the proposed transportation improvement. The proposed site is not required to have a planned entrance to the proposed transportation improvement. Clarifying language has been added to the SMART SCALE Technical Guide.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Economic Development	Primary access	Need to define primary access	To qualify as primary access to site the proposed site or parcel needs to be adjacent to the proposed transportation improvement. The proposed site is not required to have a planned entrance to the proposed transportation improvement. Clarifying language has been added to the SMART SCALE Technical Guide.
10/4/2017	Summary of Comments at public meeting	Melody Foster	Process	Lynchburg	Economic Development	Rural Areas	Would like Smart Scale to have more Economic Development questions for rural areas	The CTB has adopted the change to include additional points for economic distress using the zip code level data, which should benefit rural and economically distressed areas.
8/11/2017	email to DPRPT	Jina S. Freiburg	City of Falls Church	NOVA	Economic Development	Site Plans	Providing detailed site plans as opposed to conceptual site plans is more costly and burdensome for smaller jurisdictions. The City is supportive of maintaining the current point system for site plans.	The proposed change is not intended to place additional burden on localities. Instead it aims to better differentiate the status of site plans for submitted development sites. Often a developer will submit a conceptual site plan as part of a rezoning request. Later in the development cycle the developer will prepare and submit more detailed site plans with more design level detail. The proposed changes are meant to give more points to site plans that are further along in the usual land development process.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Economic Development	Site Plans	More information is required on the proposal related to the % of total current square footage in jurisdiction	The percent total current square footage has been modified to a cap of 10 million square feet. Projects with economic development sites exceeding 10 million square feet would require additional documentation. The SMART SCALE Technical Guide has been updated to include the required documentation.

**2017 SMART SCALE
Responses to Comments**

Date	How Submitted	Submitter	Representing (Organization)	District	Category	Issue	Summary of Comment/Recommendation	Response
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Economic Development	Site Plans	Clear definition of site plan as localities may not be using the term site plan and it may be referred to by other names such as special exception.	A detailed site plan has construction documents, engineering/architectural drawings and specifications that include construction requirements for a project. These plans are detailed enough for construction and include details regarding building pad locations, grading, drainage, utilities, parking and entrances.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Economic Development	Site Plans	City does not support proposed changes for site plans. Projects are not funded until 5-6 years, any applications submitted before site plan approval would not receive the appropriate amount of points. Further, providing detailed site plans as opposed to conceptual site plans is costly and burdensome for smaller jurisdictions.	For this round, additional points will be rewarded based on how far along a site development is in the land development process. A site with a detailed site plan is weighted higher than a site with a conceptual site plan. Applicants are not required to have detailed site plans to qualify. The objective of the revisions to this measure is to better assess the readiness of proposed sites that the proposed transportation project will benefit.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Economic Development	Square Footage Cap	Need more information to understand the proposal related to the percentage of total current square footage in jurisdictions.	An applicant may submit additional sites (square footage) above the 10 million square foot cap; however, additional documentation will be required. In such cases, there should be no impact as a result of this change. The SMART SCALE Technical Guide has been updated to include information on the required documentation.
9/7/2017	Summary from meetings with Localities and NOVA CTB Members	District Staff	NOVA applicant community	NOVA	Land Use	Methodology changes	More information to better understand the proposed changes to the land use measure was necessary. - It would be helpful to provide definition of mixed use in the technical guide. -There was general support for identification and assessment of non-work trips. However, the concern was related to a cap on the number of occurrences for each destination type which runs counter to the intent of the measure. -Clarify the basis for number of points for the different destinations	To qualify as mixed use a site or parcel must be designated in the locality's current or future zoning map as mixed use zoning or be located within a designated mixed-use zoning district, which allows for a range of land uses (residential, commercial, cultural, institutional, and/or industrial) in a single development project. The non-work accessibility methodology was developed by analyzing existing levels of accessibility throughout the Commonwealth. The destination "caps" are based on the largest number observed anywhere in Virginia (actually the 99th percentile). In other words, nowhere in Virginia scores all 100 points. Points are awarded equally to each destination class (Education, Grocery, etc.) and divided among the total number of destinations (the "cap" or "target") in that class.
10/13/2017	Letter to Secretary Layne	David Birtwistle	Northern Virginia Transportation Alliance	NOVA	Land Use	Methodology changes	The Alliance believes more information is needed on data and new methodology to evaluate access to non-workplace destinations.	The non-work accessibility methodology was developed by analyzing existing levels of accessibility throughout the Commonwealth.
9/14/2017	Letter to Secretary Layne	Sharon Bulova	County of Fairfax	NOVA	Land Use	New methodology	Need more information to understand the proposed methodology.	As part of research into development of the Accessibility score, the SMART SCALE team also looked at access to non-work destinations, such as stores, schools and parks, which account for the majority of travel on the system. The team found that non-work access scores were quite meaningful – higher scores, for example, indicated higher quality of life, lower motor vehicle demand and greater non-auto travel. These scores, based on empirical land use and transportation network data, can be readily calculated with the tool developed for measuring accessibility to jobs. In contrast, the original measure was more qualitative and speculative, e.g. points could be earned if a locality simply indicated mixed land uses could be one day approved in the project area.

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8/11/2017	email to DPRPT	Jina S. Freiburg	City of Falls Church	NOVA	Land Use	Non-Work Destinations	The City supports adding a new methodology for accessibility to key non-work destinations such as grocery, healthcare and education. Activity centers such as the City of Falls Church provide multimodal access to key destinations. Lack of mode choice is a significant contributor to congestion in the region. Incorporating measures that consider smart land use planning is in line with VTRANS goals of having accessible and connected places as well as healthy and sustainable communities.	The SMART SCALE team agrees and believes that the proposed changes to the land use measure will better reflect projects that promote population and employment density and connectivity.
10/10/2017	Letter to Secretary Layne	Wyatt Shields	City of Falls Church	NOVA	Land Use	Non-Work Destinations	The City supports adding new methodology for access to key non-work destinations such as grocery, healthcare, and education. Activity centers such as the city of Falls Church provide multimodal access to key destinations. Lack of mode choice is a significant contributor to congestion in the region. Incorporating measures that consider smart land use planning is in line with VTrans goals of having accessible and connected places as well as health and sustainable communities.	none needed
10/10/2017	Letter to Secretary Layne	Trip Pollard/Travis Pietila	Southern Environmental Law Center	Statewide	Measures	Environmental Impact	Under the Environmental Quality category (Appendix D), we remain concerned with the approach adopted in Round 2 of SMART SCALE to scale the environmental impacts measure based on benefits points received in other categories. Although we understand the Round 1 issue this change was meant to address—that of projects being recommended for funding solely based on their not having any negative environmental effects, the Round 2 solution is much broader than necessary, and results in an inappropriate “second bite at the apple” for other benefits. As a result, you can have a project with greater environmental impacts score higher under this measure than a project with fewer impacts—even one with substantial other benefits. Indeed, this seems to have been the case in Round 2 scoring. One example is the proposal to build a new Route 460 in Tidewater, which over the past decade faced significant (and for the prior 55-mile proposal, insurmountable) permitting issues, environmental mitigation costs, and public opposition due to the severe impacts it would have on wetlands, streams, and other environmental resources along its route. Yet in the second round of SMART SCALE, the project received more positive points in the environmental impacts measure than all but 21 other projects (out of 404) statewide, including numerous pedestrian, bicycle, transit, and rail projects, as well as many highway projects located within existing right-of-way. -We urge you to replace the current scaling approach with a more targeted solution, such as setting a minimum threshold for other benefits a project must receive to be able to count its points for the Environmental Impacts measure. For example, in the first round of	The official SMART SCALE score is the benefit points divided by the requested funding amount. This is important to understanding the logic for how this measure is calculated. While it is true that larger, more impactful projects can get a relatively high score for this measure, once you divide by cost you will find that larger projects often derive much smaller points per dollar requested. For example, the Route 460 project referenced in your comment ranks 340th out of 404 total projects in Round 2 when you divide the normalized environmental impact score by the requested funding amount.
10/18/2017	Email to the Portal	Joe Vidunas	Hanover County	Richmond	Measures	General	Generally we support the on-going efforts to update and refine this process, including the opportunity for localities and other stakeholders to provide input into its refinement.	none needed

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10/20/2017	Letter to Secretary Layne	John Budesky	Goochland County	Richmond	Safety	Crash Data on Projects	The revisions to the weighting scale for fatal and severe injury crashes needs further clarification. While the intentions behind the weighting revision are explained, the process for determining the revised weighting is not included.	The SMART SCALE team referenced a FHWA report (see below) which published the cost of crashes for the KABCO severity scale for a combination of high and low speed limits by different collision types. The relative crash cost values used for the SMART SCALE EPDO weights is a weighted average cost of all collision types, speed limits and the combination of fatality (K) and Serious Injury (A) crashes. The year 2001 values referenced by FHWA have been prorated to 2013 using the annual ratios of the Consumer Price Index and Employment Cost Index for two components of the costs using methods documented in AASHTO's Highway Safety Manual. The year 2013 was chosen to use the middle year of the safety analysis period. Crash Cost Estimates by Maximum Police-Reported Injury Severity Within Selected Crash Geometries (FHWA-HRT-05-051) https://www.fhwa.dot.gov/publications/research/safety/05051/05051.pdf
10/18/2017	Email to the Portal	Sarah Rhodes	Richmond Regional	Richmond	Safety	Methodology changes	Safety Measures Revises equivalent property damage only (EPDO) crash value weighting, without discussion of the process to develop or merits of new weighting factors. Please provide details on the process or evaluation that merited the proposed EPDO crash value weighting.	The previous EPDO method weighted fatal crashes at 540 EPDO and severe injury crashes at 30 EPDO. Because the difference between a severe injury becoming a fatality or vice versa is very often based on uncontrollable factors (vehicle age/condition, driver age/health, etc.), many state and local DOTs are preferring a blended rate EPDO. This weight is calculated by: $\frac{[(Wk \times K) + (Wa \times A)]}{(K + A)}$ Where Wk is the fatality weight (540), Wa is the severe injury weight (30), K is the number of fatal crashes statewide, and A is the number of severe injury crashes statewide. This approach recognizes the fact that, for example, 5 severe injury crashes that could have easily converted to fatalities should not be given less than a third the total weighting as a single fatal crash. While the societal cost of a fatality is certainly much greater than a severe injury, a single fatal crash should not necessarily indicate an 18-times greater need for mitigation than a severe injury crash that could have been a fatality if uncontrollable factors had been different. Additionally, impaired driver - based on toxicology reports - fatality crashes would be excluded as these cannot be controlled with roadway design.
9/21/2017	Letter to Mr. Whitworth	Rick Chandler	Harrisonburg Rockingham Metropolitan Planning Organization	Staunton	Safety	Methodology changes	Support proposed changes	none needed