

SMART SCALE and CTB Staff,

Thank you for the opportunity to provide feedback on the existing SMART SCALE program and for taking the time to evaluate the experiences of localities in this process.

Montgomery County has submitted applications for consideration for all five rounds of the SMART SCALE program. Based on our experiences, our staff would like to provide the following comments and points of consideration for the Commonwealth Transportation Board in their evaluation of changes to the scoring methodology and award process for the program:

1. Congestion Metrics – We are pleased to see the recommendation to return to a 10 year projection of congestion in the evaluation and scoring of potential projects. We feel that this more accurately addresses the growth pressure and transportation impacts we are experiencing in the County.
2. Economic Development Metrics – We are also pleased to see further evaluation of the economic development metrics utilized to evaluate applications. In many instances, the scale of economic development projects is directly proportional to the size of the jurisdiction being considered. Further review of the zoning and square footage criteria for economic development projects is welcomed by Montgomery County. We would also ask that the CTB evaluate the time window where economic development projects are considered as eligible for consideration in SMART SCALE applications. Many smaller, but still impactful, economic development projects in the County may be constructed quickly and closed out prior to the SMART SCALE application window. These projects, while still generating traffic impacts, may not qualify as a result of SMART SCALE's review window.
3. Residential Project Considerations as Economic Development– While economic development is a major component of the scoring methodology for SMART SCALE, we ask that the CTB further consider the impact of residential development as a factor in scoring projects. While many Montgomery County residents commute to employment opportunities within the County, major industries employing County residents are located in other neighboring jurisdictions. These residential developments support larger economic development efforts within the County and larger region, while contributing transportation impacts solely on our locality.
4. Safety Metrics – Clearly, safety concerns are a major component of the SMART SCALE program and have been at the center of many of the County's projects proposed for funding by the program. The County feels that further consideration should be given to projects that would proactively address concerns, and not solely to safety concerns identified after injuries and fatalities have occurred.

Again, thank you for this opportunity to provide comments. We look forward to seeing the continued work to evaluate and recommend changes to ensure the SMART SCALE program serves as a fair and balanced approach to the transportation needs of all Virginia localities. Please let me know if you have any questions or need additional information.

Best,

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