



November 17, 2023

The Honorable Secretary W. Sheppard Miller, III and  
Members of the Commonwealth Transportation Board  
Office of the Secretary of Transportation  
1111 E. Broad St. Room 3054  
Richmond, Virginia 23219

**Subject: Loudoun County Comments on Proposed SMART SCALE Process Review**

Dear Secretary Miller and Members of the Commonwealth Transportation Board:

Loudoun County appreciates the opportunity to provide input to the Commonwealth Transportation Board (CTB) regarding proposed changes to SMART SCALE as part of the SMART SCALE Process Review in advance of Round 6 applications. We understand that the CTB is scheduled to vote on these changes in December 2023.

Transportation is the lifeblood of Virginia's economy and with that, Loudoun County recognizes the critical role that SMART SCALE plays in advancing multimodal mobility projects across the Commonwealth. Loudoun County is a unique jurisdiction in Northern Virginia with a mix of urban, suburban, and rural environments that lend themselves to diverse transportation needs. These needs range from Silver Line Metrorail stations within the County, additional roadway capacity on Corridors of Statewide Significance and other regional networks, and enhancements in our rural area to preserve our rural road network and other associated heritage resources.

With this framework in mind, we offer the following suggestions on the proposed changes to the SMART SCALE evaluation process for Round 6:

**Application Quality**

A major area of concern identified during this SMART SCALE Process Review is the quality of applications submitted. Office of Intermodal Planning and Investment (OIP) Staff identified that 90% of all applications were incomplete at the pre-application phase and 50% were incomplete at the final submission. OIP's suggestion to improve application quality is to cut the number of applications from ten (10) to six (6) for each applicant. The thought process for this change is that a small number of applications would force applicants to only submit applications of high quality and that meet all the requirements for submission. With that said, Loudoun supports keeping the application numbers at ten (10) for Counties in Area Type A. All ten (10) of Loudoun's applications were accepted by VDOT for scoring during Round 5, and applications in Area Type A were accepted at a high rate generally.

## **Project Readiness**

While it is important for applicants to have a sense of scope when applying, SMART SCALE applications are required to be submitted years in advance of the commencement of a project. Loudoun County supports a change to acceptance criteria to focus on overall project readiness instead of construction readiness. This may take the form of a planning study or similar analysis at the time of application submittal.

## **Forward Looking Congestion**

Loudoun County supports the proposal to calculate congestion benefits for ten (10) years in the future as part of the scoring process. In fast growing localities such as Loudoun, applications should be measured against future year congestion relief rather than current congestion data as the delta between the two will likely vary significantly due to the length of time it takes for project funding to be received. A 10-year horizon is a reasonable timeframe for evaluating future congestion benefits as an addition to SMART SCALE.

Future congestion benefit modeling is already successfully utilized in the Northern Virginia region by the Metropolitan Washington Council of Governments (MWCOC) and the Northern Virginia Transportation Authority (NVTA), and we encourage VDOT and the CTB to engage these entities and other stakeholders in developing similar methodology/modeling for regional consistency.

## **Economic Development**

Loudoun County supports the staff recommended changes to the Economic Development factor to use a data-driven, standardized process to more accurately capture and project the economic benefits of transportation projects. With that said, not all transportation improvements need to be directly adjacent to a particular land development site to provide significant benefits. As such, Loudoun would recommend a wider, corridor-based assessment of SMART SCALE applications. Additionally, Loudoun suggests that VDOT consistently include the full value of proffered commitments from approved land development applications when calculating the economic development score.

## **Allocation of HPP Funding**

Loudoun County supports the elimination of Step 2 of the fund allocation process to better ensure that High Priority Program (HPP) funds are being invested in high scoring projects of statewide significance. The proposed policy change will bring the allocation of HPP funds more in line with the intent of these funds.

## **Factor Redistribution**

Loudoun County recognizes that there is a balancing act when it comes to finding the correct weight distribution for each category in SMART SCALE. With the increasing number of traffic fatalities and serious injuries in our region, Loudoun applauds the increased (+15 percent) distribution to Safety in the OIPI staff proposed scenario. Additionally, Loudoun supports the weighting of Economic Development at five (5) percent and Environment at ten (10) percent. However, Loudoun must differ from OIPI staff and support the scenario proposed by CTB Member

Mary Hynes regarding Congestion Mitigation and Accessibility. OIPI Staff did an admirable job, however we believe the proposed weighting listed below best represents the interests of our region.

NOVA Proposed Weighting by CTB Member Mary Hynes:

Congestion Mitigation – 40%  
Safety – 20%  
Accessibility – 25%  
Economic Development – 5%  
Environment – 10%  
Land Use as a Multiplier


**Closing**

We appreciate the opportunity to provide our comments. This is an important decision, and we know the members of the CTB are working hard to provide a balanced approach to funding multimodal transportation projects throughout the state. Overall, the proposed changes are very promising, and we look forward to seeing them in place during the next round of SMART SCALE.

It is important to remember that SMART SCALE should be the primary source of funding for larger projects of regional or statewide significance. In Loudoun, including our incorporated Towns, we have needs for major system improvements on our existing and planned network that would establish or significantly improve regional connections and facilitate access to major regional facilities. We look to the CTB to do its part in funding SMART SCALE applications for these types of projects going forward.

Thank you, Secretary Miller and CTB members, for your efforts regarding the ongoing SMART SCALE process review. We would like to especially thank CTB members Mary Hynes and Scott Kasproicz for all you do to help Loudoun County and Northern Virginia.

Sincerely,

DocuSigned by:  
  
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Tim Hemstreet  
Loudoun County Administrator

cc: Loudoun County Board of Supervisors  
Erin McLellan, Deputy County Administrator  
Nancy Boyd, Director, Department of Transportation and Capital Infrastructure (DTCI)  
Lou Mosurak, Assistant Director, DTCI  
Rob Donaldson, Senior Regional Transportation Planner, DTCI  
Carol Mathis, CTB Board Administrator