

**2020 SMART SCALE
Responses to Comments**

Date	Submission Type	Submitter	Representing (Organization)	District	Summary of Comment/Recommendation	Response
9/25/2019	Letter	Joseph Kroboth, III	Loudoun County	Northern Virginia	<p>Land Use points, based on walkability to shopping, recreational, medical and school trips, became the highest points achieved in most of the funded projects in NOVA. Being able to walk to the neighborhood store is a good choice of modes, but should not be worth up to 20 points in our region, and dominate the scores. We recommend that this measure be re-defined to support Transportation Efficient Land Uses for all modes.</p> <p>Projects adjacent to land zoned for a particular type of development, even higher densities, by itself should not be scored unless there is an active application in that jurisdiction at the time the application is submitted. We recommend if there is an approved application that meets the Objectives of the ED measure that should score the highest. In addition, we recommend that the "buffer distances" between the project and the project should be re-evaluated. Not all transportation improvements need to be directly adjacent to the development to provide significant benefits. In addition, the ED measure of "Travel Time Reliability" belongs under the Congestion Mitigation measure.</p> <p>Current measures for congestion are split 50/50 amongst "person throughput" and "person hours of delay"...we recommend that only one measure, person hours of delay, be used. We recommend that Round 4 needs to have a ten year horizon again for treating congestion.</p> <p>We recommend that the State should award funding levels to the Districts using a normalized approach where the scoring methodology is the same, but when allocating district funds, the scores should be "normalized" within each District. This allow projects only within each District to compete against those other projects in the same District.</p> <p>we have suggested that the CTB consider allowing a jurisdiction to advance a project, once it is approved by the CTB and included in a SYIP, with a commitment from the State to reimburse that jurisdiction for eligible cost, in the original fiscal years the project was placed in the SYIP.</p> <p>We do not want to have proffer funds be replaced with Smart Scale funds, but we do recommend that the Guidelines include opportunities to use proffers, as it does with other funding sources, as leverage for completing the project is the most cost efficient way.</p>	<p>Proposed changes to Land Use factor are not intended or designed to penalize high density communities. While conducting a post scoring assessment and review the SMART SCALE team noticed that projects were deriving a significantly higher amount and proportion of points in the L1 and L2 measures. The L1 measure in particular was deriving a significantly higher number of points per \$10M in project funding request than other measures. As we looked into this observation further it was determined that projects that perform well in L1 measure also perform well in L2, however; project that perform well in L2 do not necessarily perform well in L1. The rationale for the proposed change was give higher growth areas a slight boost without hurting areas that are already dense population and employment centers. The Economic Development measure allows for Zoned Only projects as recognition that accepted zoning is the first step to further property development and that the level of available transportation resources can dictate whether applications to move forward with projects on those parcels materialize. The SMART SCALE team understands that upstream transportation improvements can greatly aid downstream access to properties, but in the interest of putting multimodal and human powered transportation of equal footing with automotive oriented methods of transportation we feel the current buffer provides the best balance. Similarly, Congestion uses Person Throughput as a measure to capture the benefits of non-traditional modes of travel that move more people through a corridor, regardless of the speed at which they move. An analysis has been done regarding the difference between using the current year and a 10-year horizon for the congestion measures and found no meaningful difference between the results each produced in the SMART SCALE process. SMART SCALE is a truly statewide process and in order to keep things standardized across the state scoring is done on all applications relative to each other.</p>
10/15/2019	Fall Meeting (discussion)	Ron Svejkovsky	Tri-Cities MPO	Richmond	<p>One: are there any changes we should know of, and when will we know? Two: will projects that address Safety needs identified in corridor studies, Rural Long-Range Plans, and other plans and studies (Not just PSIs) still be eligible for SMART SCALE? This is a concern.</p>	<p>The CTB approved policy changes on February 19, 2020. The adopted CTB Resolution can be viewed via the ctb.virginia.gov website. Types of studies to be accepted include: STARS reports, documented Roadway Safety Audit (Assessment), or any other study that covers crash types, severity, and associated safety improvements.</p>
10/22/2019	Fall Meeting (discussion)	Jake Jakubek	Alexandria Transportation Commission	Northern Virginia	<p>Concerned about SMART Scale changes. The Mayor of Alexandria will be submitting a letter on concerns regarding SMART Scale. The CTB only funded Phase 1 of one of the most important projects, West End Transit- way. Transit and bike/ped projects have best environmental impact but those projects will be most negatively impacted by proposed changes to SMART Scale. Concerned with SMART Scale proposed changes for Safety Evaluation and Scoring methods & weights as well as changes to Congestion Scoring which does not address regional concerns.</p>	<p>The intention of SMART SCALE is to support sustainable, multimodal projects that serve the Commonwealth best while needing the smallest financial commitment. Transit, pedestrian, and bike projects have historically fulfilled this duty and that fulfillment has been reflected in their placement among those applications selected for funding. We understand your concern that our changes will negatively impact the competitiveness of these projects, but our in-house analysis does not bear this out. We will, however, keep this in mind moving forward and if multimodal and human powered improvements become less favored in Round 4 we will adjust accordingly. The intent of using targeted Crash Modification Factors in our methodology is to make the measuring process as honest and objective as possible, not to disadvantage any projects, and there may be instances where the aggregation of CMFs will lead to a greater benefit than under the current methodology. Changing the weightings to put more of an emphasis on frequency over volume is intended to address the reality that areas that tend to have lower volumes tend to also be further from emergency resources making the results of any individual crash more catastrophic than those that occur in more developed parts of the Commonwealth. Finally, the changes Congestion scoring are attempts by the SMART SCALE team to capture intense high volume intervals that happen on weekends and are undervalued in current methodology.</p>
10/22/2019	Fall Meeting (discussion)	Jason Stanford	Northern Virginia Transportation Alliance	Northern Virginia	<p>Concerned with changes to SMART Scale Prioritization. Agrees with removing L1 (20% to 15% reduction); Opposes removing interstate projects</p>	<p>The SMART SCALE prioritization process is one that was designed with statewide equanimity in mind, however we are always open to hear specific proposals for improvement. Currently, the proposed ineligibility of interstate projects for SMART SCALE has been removed from consideration.</p>

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10/22/2019	Fall Meeting (discussion)	Rob Whitfield	Northern Virginia Transportation Committee	Northern Virginia	Too much of the \$200M funding for SMART Scale went to Transit projects. If the overpasses are demolished on Rt.1 then VDOT should pull the SMART SCALE funding in Arlington. Need oversight and an audit for costs and spending on Smart Scale projects e.g. Potomac Yards Metro Station and Alexandria transit project (West End Transitway) - projects not close to final design.	Thank you for your comments regarding the prioritization of this most recent round of SMART SCALE - it is not the intent of the process to favor one sort of improvement over others, and the goal is on balance to pick the projects that best serve the interests of those who use the Commonwealth's transportation network. Further, if the scope has changed on the Route 1 project that is something the SMART SCALE team should be made aware of and consider, but if Arlington applied and was approved for an application that removed overpasses that is between the citizens of Arlington and their elected officials and outside the purview of the SMART SCALE team. Last, we are currently undergoing a review of all locally administered and VDOT projects for unanticipated and unannounced change in scope with a follow up examination on costs planned.
10/30/2019	Fall Meeting (discussion)	Eli Sharp	New River Valley PDC	Salem	Would like to see localities get input on Land Use designations and how scored	It is our intention to work on all changes in methodology with all SMART SCALE stakeholders including our applicant community. We apologize if your locality felt left out of the discussion on recent changes to Land Use and we'll endeavor to communicate with them more directly in the future.
10/30/2019	Fall Meeting (discussion)	Cline Brubaker	Franklin County Board	Salem	Safety and Economic Development need to remain the focus of SMART SCALE	SMART SCALE remains committed to ensuring the safest possible projects compose the Six-Year Improvement Plan and the team appreciates the importance of Economic Development to many of those in the applicant community.
10/30/2019	Fall Meeting (discussion)	Craig Meadows	Montgomery County	Salem	Doesn't like the pre-application window being shortened without decreasing required submittals; concerned about not being able to get SMART SCALE funds for I-81; appreciates the changes to the cost estimation process	The decision to shorten the pre-application window this round was made in an effort to streamline the SMART SCALE intake process, which in part included relaxing the necessary components of a pre-application to Scope, preliminary cost estimates, and project area. In addition, the total amount of submissions an applicant can make has been reduced according to the size of the population they serve. SMART SCALE's policy of not committing money to the Six-Year Improvement Plan for projects which already have full funding remains in place, however interstate projects - including those on I-81 - without funding remain eligible for SMART SCALE consideration. Thank you for the kudos on the new cost estimation proposal.
11/18/2019	Letter	Regina Grant	Department of Defense		DASH is hopeful that the CTB will reconsider many of the proposed changes that undermine the goals of SMART SCALE and VTRANS by limiting multimodal travel options. VDOT and the CTB are asked to slow down this process to minimize unintended consequences before adopting these changes. Several of the proposed changes will negatively impact jurisdictions that are already dense and that want to invest in environmentally sustainable projects that move people and relieve congestion. The SMART SCALE test scenario showed that the types of projects that would be most negatively impacted by the proposed changes were transit, bike, and pedestrian projects which are the most important types of projects for improving mobility and reducing congestion.	The intention of SMART SCALE is to support sustainable, multimodal projects that serve the Commonwealth best while needing the smallest financial commitment. Transit, pedestrian, and bike projects have historically fulfilled this duty and that fulfillment has been reflected in their placement among those applications selected for funding. We understand your concern that our changes will negatively impact the competitiveness of these projects, but our in-house analysis does not bear this out. We will, however, keep this in mind moving forward and if multimodal and human powered improvements become less favored in Round 4 we will adjust accordingly.
11/25/2019	Letter	Sharon Bulova	Fairfax County Board of Supervisors	Northern Virginia	The Board has concerns with reducing the weight of the Land Use factor in urban areas from 20 percent to 15 percent while increasing the safety factor from 5 percent to 10 percent. While we do support efforts to improve safety, we also believe that if any changes between factor weights are undertaken, they should be done holistically, rather than reducing one measure. Further, a land use connection is important to reducing congestion in Northern Virginia. The Board of Supervisors also continues to believe that while the process has been objective, it is also complex, cumbersome, time consuming, and expensive for submitters and the Commonwealth. The complexity also makes the process and the scoring more difficult for the public to understand. We are concerned that the proposed changes do not address the underlying complexity.	Proposed changes to Land Use factor are not intended or designed to penalize high density communities. While conducting a post scoring assessment and review the SMART SCALE team noticed that projects were deriving a significantly higher amount and proportion of points in the L1 and L2 measures. The L1 measure in particular was deriving a significantly higher number of points per \$10M in project funding request than other measures. As we looked into this observation further it was determined that projects that perform well in L1 measure also perform well in L2, however; project that perform well in L2 do not necessarily perform well in L1. The rationale for the proposed change was give higher growth areas a slight boost without hurting areas that are already dense population and employment centers. Further, we understand the frustrations of the applicant community with complexity of the SMART SCALE process and are always working internally to streamline it however we can, and remain open to suggestions from outside to achieve this goal.
11/26/2019	Letter	Josh Baker	Alexandria Transit Company	Northern Virginia	DASH is hopeful that the CTB will reconsider many of the proposed changes that undermine the goals of SMART SCALE and VTRANS by limiting multimodal travel options. VDOT and the CTB are asked to slow down this process to minimize unintended consequences before adopting these changes. Several of the proposed changes will negatively impact jurisdictions that are already dense and that want to invest in environmentally sustainable projects that move people and relieve congestion. The SMART SCALE test scenario showed that the types of projects that would be most negatively impacted by the proposed changes were transit, bike, and pedestrian projects which are the most important types of projects for improving mobility and reducing congestion.	The intention of SMART SCALE is to support sustainable, multimodal projects that serve the Commonwealth best while needing the smallest financial commitment. Transit, pedestrian, and bike projects have historically fulfilled this duty and that fulfillment has been reflected in their placement among those applications selected for funding. We understand your concern that our changes will negatively impact the competitiveness of these projects, but our in-house analysis does not bear this out. We will, however, keep this in mind moving forward and if multimodal and human powered improvements become less favored in Round 4 we will adjust accordingly.
11/26/2019	Letter	Thomas Hartman	City of Harrisonburg	Staunton	Our main comments are related to the reduction in preapplication submittal time, and the locking of project scopes, and possibly estimates, at the preapplication submittal. We feel these changes place undue burdens on smaller localities with limited staff and ignore the fact that developing the scope and estimate is an iterative process...frequently, once a project is scoped and estimated the project may be rescoped to bring the estimate down, and sometimes the changes are significant. The costs of our other applications can also play a part in the scopes/estimates ultimately decided on for an application. To alleviate some of our concerns, making the preapplication questions available before the Smart Portal actually opens in March would allow us to determine how much work is going to be required, and allow us to start developing the application before the one-month window opens. Alternatively, the Smart Portal could open earlier, to provide ample time. We feel that if a working group that included OIPI, VDOT, and locality staff from around Virginia would have been created and tasked with addressing SmartScale issues, our concerns would have been shared much earlier in the process.	Our team understands that it can be difficult for applicants to respond quickly to changes in local decisions or react thoroughly to new VTrans releases, however it has been our experience that requirement standards that are too relaxed lead to extra time during the scoring process as our analysts, district points of contacts, and applicants communicate back and forth with each other over requirements that sometimes never materialize; similarly, scope changes after application submission can lead to analysts having to score the same application multiple times as the scope changes. We feel our current methodology balances the needs of all the stakeholders in the SMART SCALE process. The decision to shorten the pre-application window this round was made in an effort to streamline the SMART SCALE intake process, which in part included relaxing the necessary components of a pre-application to Scope, preliminary cost estimates, and project area. It is our intention to work on all changes in methodology with all SMART SCALE stakeholders including our applicant community. We apologize for including you in the discussion later rather than sooner and we'll endeavor to communicate with you more proactively in the future.

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11/27/2019	Letter	F. Wyatt Shields	Falls Church	Northern Virginia	<p>The City does not support proposed changes to the "Land Use" measure in the scoring analysis. The City supports maintaining the current weighting of the Transportation and Efficient Land Use measure, which favors projects in areas that are already very dense over projects in areas where existing density is low. The City does not support the continued increase in the number of requirements related to project readiness. These requirements are burdensome for smaller localities, which have fewer resources available for studies or the development of plans prior to applying for project funding. The City does not support changes to the Safety measure in the scoring analysis. The City supports a safety measure that emphasizes severity as opposed to number of crashes. If there is a change to the Type A weighting of the Safety measure, the points should not be deducted from the Area Type A weighting of the Land Use measure. Compact land use patterns that support pedestrian, bicycle and transit modes of travel also have favorable impacts on safety.</p> <p>The City requests that budgeting of SmartScale funds be allocated by fiscal year such that</p> <ol style="list-style-type: none"> 1.Funds advanced are sufficient to advance entire phases, Preliminary Engineering (PE), Right-of-Way (RW), Construction (CN) 2.Construction (CN) funds are available no later than 2 years after PE 	<p>Proposed changes to Land Use factor are not intended or designed to penalize high density communities. While conducting a post scoring assessment and review the SMART SCALE team noticed that projects were deriving a significantly higher amount and proportion of points in the L1 and L2 measures. The L1 measure in particular was deriving a significantly higher number of points per \$10M in project funding request than other measures. As we looked into this observation further it was determined that projects that perform well in L1 measure also perform well in L2, however; project that perform well in L2 do not necessarily perform well in L1. The rationale for the proposed change was give higher growth areas a slight boost without hurting areas that are already dense population and employment centers.</p>
11/27/2019	Letter	Melissa McMahon	Alexandria Transportation Commission	Northern Virginia	<p>Preserve scoring for existing Land Use; Preserve the weekday Congestion scoring methodology; Prioritize crash severity over volume take increased score from other categories equally; More flexibility to complete requirements after application, more flexibility when scopes change; Do not limit funding of transit maintenance facilities to stock increases.</p>	<p>Proposed changes to Land Use factor are not intended or designed to penalize high density communities. While conducting a post scoring assessment and review the SMART SCALE team noticed that projects were deriving a significantly higher amount and proportion of points in the L1 and L2 measures. The L1 measure in particular was deriving a significantly higher number of points per \$10M in project funding request than other measures. As we looked into this observation further it was determined that projects that perform well in L1 measure also perform well in L2, however; project that perform well in L2 do not necessarily perform well in L1. The rationale for the proposed change was give higher growth areas a slight boost without hurting areas that are already dense population and employment centers. Further, we understand the frustrations of the applicant community with complexity of the SMART SCALE process and are always working internally to streamline it however we can, and remain open to suggestions from outside to achieve this goal. The changes Congestion scoring are attempts by the SMART SCALE team to capture intense high volume intervals that happen on weekends and are undervalued in current methodology and the plans to take weighting from Land Use to apply to Safety have been scrapped as a result of ongoing discussion while the current plan is to increase the emphasis on Crash Frequency, which should reflect the intensity of crashes. Our team understands that it can be difficult for applicants to respond quickly to changes in local decisions or react thoroughly to new VTrans releases, however it has been our experience that requirement standards that are too relaxed lead to extra time during the scoring process as our analysts, district points of contacts, and applicants communicate back and forth with each other over requirements that sometimes never materialize; similarly, scope changes after application submission can lead to analysts having to score the same application multiple times as the scope changes. We feel our current methodology balances the needs of all the stakeholders in the SMART SCALE process. The decision to limit funding of maintenance facilities to those connected to an increase in rolling stock was made to bring transit projects in line with the State of Good Repair standard set for roadway projects.</p>
11/27/2019	Letter	Dennis Leach	Arlington County	Northern Virginia	<p>Deleting the existing L.1 component of the land use criterion (by changing the L.1/L.2 weighting from 70% / 30% to 0% / 100%) and excluding existing land use from project scoring in Area Type A unnecessarily penalizes high-density places that have demonstrated success resulting from decades of congestion -reducing smart growth policies and practices...it is doubly punitive to eliminate the L.1component while at the same time reducing the overall weight of the land use criterion by five percent (from 20% to 15%).</p> <p>The proposal to expand the SMART SCALE congestion mitigation measure to shift from five days a week to seven days a week is a methodological improvement but also assumes that the most appropriate solution for weekend congestion are highway improvements, which is not the case statewide. An overemphasis on weekend congestion penalizes jurisdictions that have successfully managed local congestion but are struggling to handle regional to-and-through traffic.</p> <p>, the proposed change to the weighting of the S.1 and S.2 criteria in SMART SCALE (from 50% / 50% to 70% / 30%) would prioritize the equivalent property damage only (EPDO) number of crashes over the EPOO crash rate, which de-emphasizes crash severity and contradicts our mutual safety goals. Also, while safety is a priority, the increased overall weight for the safety criterion should not be taken from the Land Use criterion...adopting scoring mechanisms that deprioritize crash rate and that penalize the most walk and bike-reliant land use locations will unquestionably result in a less safe transportation system that puts the most vulnerable users at greater risk.</p>	<p>Proposed changes to Land Use factor are not intended or designed to penalize high density communities. While conducting a post scoring assessment and review the SMART SCALE team noticed that projects were deriving a significantly higher amount and proportion of points in the L1 and L2 measures. The L1 measure in particular was deriving a significantly higher number of points per \$10M in project funding request than other measures. As we looked into this observation further it was determined that projects that perform well in L1 measure also perform well in L2, however; project that perform well in L2 do not necessarily perform well in L1. The rationale for the proposed change was give higher growth areas a slight boost without hurting areas that are already dense population and employment centers.</p>

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12/10/2019	Email	Mike Sawyer	City of Richmond	Richmond	Keep City/Jurisdiction wide projects because Citywide / Systemwide based projects allow for implementation of a systemic approach to widely and consistently deploy improvements and provide benefit to the greatest number of transportation network users, including pedestrians, cyclists, cars, buses, heavy vehicles, and emergency vehicles. Further, Citywide / Systemwide based projects allow for more cost-effective deployment of improvements due to economies of scale. The City does not support the FAR cap for zoned only projects of .3 because while development that is occurring in already redeveloping areas can be proven at a higher FAR ratio based on adjacent economic development projects, the proposed change negatively impacts less dense and underdeveloped areas. The Land Use measure should go to a 50-50 L1/L2 split, not drop L1 entirely. The City requests more information on the proposed targeted CMF approach. Which project types will be evaluated differently? The City's complete streets approach to transportation projects applies a multimodal emphasis and considers that improvements for one mode of travel contribute to the safety of all modes of travel.	Current SMART SCALE methodologies do not capture the benefits of jurisdiction wide projects to the level our team considers adequate or defensible, which could allow applicants to pad otherwise acceptable SMART SCALE submissions with elements that fall outside the programs purview. We appreciate the economies of scale, but currently consider corridor level analysis is the highest level we can perform to our standards. The FAR cap at .3 is only for Zoned Only parcels and can be overridden with a local zoning ordinance that has a higher minimum FAR as well as the average of adjacent properties. The most up-to-date proposal is to give L1 and L2 a 50-50 split. Our SMART SCALE team would be happy to discuss the proposed CMF changes with you and we will have one of our members reach out to you directly.
1/6/2020	Email	David Beale	VDOT	Fredericksburg	1. I'm not familiar with the VEDP Tiers 3-5. I won't have this information during validation or know where to find it. It will be incumbent on the applicant to provide proof of this to substantiate the status of the site. 2. Lessening the points for approved site plans and providing additional points for re-development sites would seem to favor economic development in cities and areas that were previously developed. Caroline, for example, doesn't have many redevelopment sites, so this scoring system would lessen the benefit of an approved site plan supporting their projects and weaken their application.	1. http://gis.vedp.org/ - "AVAILABLE SITES" - Use the download button for a spreadsheet, KML, or shapefile. This data will also be integrated into the SMART Portal. 2. Reacted to comment by forming a VDOT Workgroup. VEDP and Redevelopment is an OR condition with site getting up to a point for VEDP and up to a point for Redevelopment, not both. This attempts to strike a balance between rural and urban areas.
1/9/2020	Email	Megan Cronise	Roanoke County	Salem	Roanoke County has considered the proposed Round 4 weighting process changes highlighted in the below email. Roanoke County is supportive of these changes.	Reacted to feedback regarding economic development measure, by forming a VDOT Workgroup. VEDP and Redevelopment is an OR condition with site getting up to a point for VEDP and up to a point for Redevelopment, not both. This attempts to strike a balance between rural and urban areas.
1/13/2020	Email	Blake Ailor	VDOT	Bristol	Seeing that Economic Development is the highest scoring criteria for the Bristol District I have some slight concerns about decreasing the point system. The main reason for my concern about decreasing it so much is that our District will not be as competitive for the High Priority Funds when scored against the rest of the Commonwealth due to a decrease in points from the changes. Furthermore, believe that the guidelines for redeveloping an existing site needs to be tight because this new category can now place other districts at a greater advantage for economic development points that were not previously a priority, thus making it even more difficult for our District to be competitive for the High Priority Funds. I feel that these concerns should be looked into in regards to our District and Fredericksburg because we are completely a Category D district and these changes may put us at a disadvantage against categories A-C, specifically when it comes to High Priority Funds.	Reacted to comment by forming a VDOT Workgroup. VEDP and Redevelopment is an OR condition with site getting up to a point for VEDP and up to a point for Redevelopment, not both. This attempts to strike a balance between rural and urban areas.