

Comments - Policy for the Prioritization of the VTrans Mid-term Needs

Comment Period: October 29, 2020 through November 30, 2020

ID	Name of Submitter	Submitter's Affiliation (if applicable)	Date Received	Method Received	Comment
1	David Foster	RAIL Solution	11/6/2020	Email	The prioritization process seems well planned and executed, but it suffers from the limitation that the rankings include only those project ideas initially included. Life isn't that static, and somehow it seems to me that this process needs to allow for unforeseen projects that now are very important in light of changed needs or opportunities. How is this addressed?
2	John Madera	NSVRC/WinFred MPO	11/16/2020	Email	The Transit Access to AC methodology, as well as the results in the Win-Fred region, are not intuitive to me. Roads deemed Very High Priority extend far into the countryside west, north and east of Winchester, areas not planned or forecast for growth under any horizon. Points increase with higher functional classification/increased speed, an approach that seems to favor commuter/express service – not feasible in little Winchester. In short, the methodology does not seem to produce credible results.
3	Sarah Crawford	Arlington County	11/20/2020	Email	As Dennis outlined, and Rich detailed, we're vested in ensuring that the plan is balanced across all modes, and that weightings are distributed evenly across modes. I empathize that Virginia is a very diverse state. For regional transportation to be successful in Arlington, and across Northern Virginia, we need all modes to take up a proportional share of the mode split, and we need that to be reflected in how our priorities are rated.
4	Chloe Delhomme	City of Manassas	11/20/2020	Email	My main concern related to the priorities is that the Liberia Avenue corridor (including Liberia Avenue intersection with Prince William Parkway) is higher in priority for safety but not congestion for the RN. Our transportation master plan identified that intersection as well as a section of Liberia Avenue as a priority for congestion.
5	Anne Nygaard	City of Lynchburg	11/23/2020	Email	Wording on Step 1, specifically "Define Geographical Levels of Prioritization" is really difficult to understand and not immediately cleared up by "establish criteria for aggregating VTrans Need Categories." The text below on page 15 of the Policy Guide helps but I was hung up on the Step 1 language for a while.
6	Anne Nygaard	City of Lynchburg	11/23/2020	Email	In Step 3 (page 18 of the Policy Guide), Congestion Mitigation is weighted at 25% on CoSS and Area Type A for Construction Districts. Without knowing what the mitigating project will be, this seems high. Best practices in transportation planning are moving away from lane increases as it is becoming more and more clear that you cannot build your way out of congestion. Add another lane and there will be induced demand that leads to more congestion. I suggest revisiting this to give more weight to transit and pedestrian access to activity centers or any that more clearly support good land use as a better way to deal with congestion.
7	Anne Nygaard	City of Lynchburg	11/23/2020	Email	Overall- great work. It took me a while to wrap my head around it but the process seems logical and well done.
8	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	<p>On page 19, it lists the priorities by mileage as: Priority 1 for 0-1%, Priority 2 for 1-5% Priority 3 for 5-15% Priority 4 for 15-100%</p> <p>This breakdown appears to be very restrictive; can this be spread out differently (like 1 = 0-10%, 2 = 10-20%, 3 = 20-50%, and 4 = 50-100%)? These are Priorities that were filtered down from the Mid-Term Needs which were already filtered down from the entire transportation system.</p>
9	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	<p>While it is commendable (and good planning) to use a variety of needs types (not just one or two), some VDOT study programs (especially STARS) may not be used by VDOT/DRPT to study/develop corridors that primarily have serious safety and/or congestion needs but are not of a high enough overall Mid-Term Needs Priority.</p> <p>Assuming the CTB will act in the same way in this "Prioritization/Project Pipeline" exercise as they did in the previous VTrans effort (which had Tier 1, 2 and 3), the "Prioritization/Project Pipeline" study/project development Policy adopted by the CTB may likely limit VDOT/DRPT to fund or study (ex: only Priority 1 or maybe 2 Needs).</p>
10	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	(Referring to Ashland to Petersburg Trail Study) The ATP may not be eligible for VDOT/DRPT study/project development assistance if the CTB adopts a "Prioritization/Project Pipeline" policy (ex: only Priority 1 or 2 Needs).
11	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	How do you address off-road or system-wide needs?
12	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	We are a small MPO and cannot fund these studies/analyses ourselves. This "Prioritization/Project Pipeline" process for VDOT/DRPT planning/study assistance will likely be the only way a need is studied in small MPOs and PDCs. This will make our MPO and PDC LRTP project prioritization processes difficult (even if we plan on using the VTrans Mid-Term Needs data).
13	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	<p>The Mid-Term Needs Prioritization Map appears to identify Priority 1/2 Mid-Term Needs that we also identify as MPO needs for a few locations (ex: Route 1/301 at Woods Edge/Happy Hill, which we and VDOT funded and constructed). However, many needs identified in other recent studies conducted or funded by VDOT (using much of the same information) are not even Priority 2 Mid-Term Needs.</p> <p>A prime example is the I-85/95 interchange, which was a key priority need identified in VDOT's I-95 Corridor Study but is a Priority 3/4 Mid-Term Need. Also, the I-95 interchange needs identified in that Study in the TCAMPO area do not appear to have been evaluated.</p> <p>Will further study/project development of these identified needs be eligible to be conducted (and funded) by VDOT/DRPT? Other examples include the Route 58 COSS Study.</p>

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14	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	It also appears most of the handful of Priority 1 Mid-Term Needs locations in the Tri-Cities Area MPO are intersections. This was noted by our Crater PDC Executive Director in an earlier Workshop.
15	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	It also appears that there are no Priority 1 or 2 Mid-Term Needs locations in the rural portion of the Crater PDC area. This "Prioritization/Project Pipeline" exercise further increases the funding imbalance/inequity between urban and rural needs.
16	Ron Svejkovsky	Tri-Cities MPO	11/23/2020	Email	Meadowville Technology Park continues to be missed. This is a Tier 4 IEDA Business Ready Site, like White Oak and other sites. The Mid-Term Needs Priorities map shows a Priority 1 Mid-Term Need at the intersection of N. Enon Church Road and Route 10, and various UDA Mid-Term Needs are identified in the immediate vicinity on the Mid-Term Needs map but not the Mid-Term Priorities map. We believe the most cost-effective way to improve access to MTP from I-295 is to widen N. Enon Church Road to Route 10; unfortunately, the Mid-Term Needs Priorities map does not show the MTP or the nearby UDA needs or the Mid-Term Needs Priorities related to the MTP IEDA site, so it appears access between this IEDA Site and the Interstate may not be eligible for further study/project development by VDOT/DRPT.
17	Hillary Orr	City of Alexandria	11/24/2020	Email	(In reference to Area Type A weighting) The pedestrian safety and transit equity weights are quite low. The fact that roadway safety is separate and a much higher weight than pedestrian safety is concerning, particularly as many jurisdictions in the region have adopted Vision Zero policies.
18	Hillary Orr	City of Alexandria	11/24/2020	Email	(In reference to Area Type A weighting) Equity is an important value in this region and transit equity (in reference to Transit Access to Equity Emphasis Area) in particular is of great importance. Congestion and reliability criteria are weighted highly and are someone redundant of one another. It could be possible to trip the weights of those to add value to pedestrian safety and transit equity.
19	Hillary Orr	City of Alexandria	11/24/2020	Email	The City feels more comfortable with the higher weights for congestion or reliability with the understanding that a congestion or a reliability need does not necessarily mean a roadway project solution. However, we are concerned that that will be the default. Improved guidance on this point may be beneficial, as transit, pedestrian, and bicycle facilities should be solutions that are emphasized to address these needs.
20	Hillary Orr	City of Alexandria	11/24/2020	Email	We also understand that there was an attempt to align the VTrans needs prioritization with SMART SCALE, but there are differences that could be better explained. A clear alignment and explanation of how high priority VTrans needs can result in high scoring funded projects would be helpful.
21	Hillary Orr	City of Alexandria	11/24/2020	Email	It would also make sense to tie HSIP and TIP funding to the VTrans priority needs. Creating one application for all projects and having them scored related to the criteria for different grant programs would streamline the application process which is time consuming, especially for smaller jurisdictions.
22	Charles Boyles	TJPDC	11/25/2020	Email	While we support the overarching desire to take a performance-based approach to identify the areas of the highest need in order to direct limited resources, we are concerned about the potential impacts this performance-based prioritization system may have especially on the rural parts of the state should these recommendations be used to guide policies regarding access to funding for transportation planning purposes. On the FAQ section of the VTrans website, the response to "Why prioritize the 2019 Vtrans Mid-term Needs?" states that the prioritized 2019 Mid-term Needs "may form the basis for the state to make more informed decisions about locations to conduct planning studies and project development activities that will contribute the most to help address the Needs. Priorized VTrans 2019 Mid-term Needs may also be used for development of policies related to transportation programs and activities." It is the impact of these prioritized needs that we are most concerned about.
23	Charles Boyles	TJPDC	11/25/2020	Email	The VTrans Mid-term Needs is a very top-down approach to determining where investment into transportation studies and analysis would be most beneficial. The performance indicators, while highlighting the areas with the largest performance deficiencies, fail to account for the previous investment of resources. Many of the areas identified as Priority 1 needs, such as Route 29 near the Hydraulic Road intersection in Charlottesville and Albemarle County, are areas that have already received large amounts of investment for planning purposes. MPOs, PDCs, and the VDOT Planning Districts are in the best position to determine where the planning resources are most needed since they know the local systems, past planning efforts, and pending transportation system improvement projects (the benefits of which would not yet be reflected in the data that is used to generate the priorities).
24	Charles Boyles	TJPDC	11/25/2020	Email	While we understand that an identified need of any VTrans priority level is eligible for funding through Smart Scale and other competitive application processes, our larger concern is continuing to support our localities' ability to understand and identify network deficiencies, develop proposed solutions, and prepare competitive applications for funding, all of which require planning studies funded by VDOT. Should access to these funds be allocated strictly based on the prioritization of needs in the VTrans Mid-term Needs update, the least resourced areas in the rural parts of the state will lose much of the support they need to make meaningful improvements in their transportation systems.
25	Charles Boyles	TJPDC	11/25/2020	Email	As policies related to resource allocation or project prioritization are developed based on the VTrans Mid-term Needs update, our hope is that there will be significant consideration given to how to ensure continued access to planning resources for the rural portions of the state.
26	Charles Boyles	TJPDC	11/25/2020	Email	We also request that you make the process of developing and adopting these policies as transparent as possible, providing updates and outreach to the MPOs and PDCs throughout the state, and allowing ample opportunity for us to discuss the potential impacts with our Boards and Commissions and provide comments to the Commonwealth Transportation Board prior to their adoption.

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27	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) appreciates the effort to provide additional funding for studies given the competitive nature of state funding programs. In addition to the VTRANS Multimodal Project Study pipeline, the City also appreciates the creation of the Growth and Accessibility Planning Technical Assistance Program, which will be used to support studies in Urban Development Areas.
28	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) requests that the overall understandability of VTRANS be improved, perhaps through a diagram or executive summary clarifying how different aspects of the plan are used.
29	Kerri Oddenino	City of Falls Church	11/25/2020	Email	<p>The City (of Falls Church) requests that additional information be provided about the VTRANS Multimodal Project Study pipeline program, in terms of funding availability, application process, and timeline.</p> <p>The City also requests that additional information be provided about how and which other state funding programs besides Smart Scale and Revenue Sharing may end up using VTRANS as a screening tool.</p> <p>The City understands that the addition of VTRANS as a tool for screening other funding programs would involve the opportunity for public process including input from localities.</p>
30	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) requests that greater emphasis on the connection between land use and transportation be reflected in the VTRANS statewide and construction district priorities. The City would like to see a statewide plan that promotes accessible and connected places, and increases the opportunities for people and businesses to efficiently access jobs, services, activity centers, and distribution hubs, as noted in goals of current VTRANS plan.
31	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) supports the addition of activity centers on maps in the VTRANS plan and interactive map (InteractVTrans).
32	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) would like to see a greater focus on meeting environmental and equity goals, including the electrification of private and public vehicles and the creation of the infrastructure needed to support them.
33	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) would like to see a greater focus on the importance of continued prioritization of technological advances that will help improve safety, environmental performance, service levels, and equity.
34	Kerri Oddenino	City of Falls Church	11/25/2020	Email	<p>The City (of Falls Church) understands that VTRANS is a statewide plan, and that data across the state for different types of modes is not readily available everywhere. The City also understands that in the VTRANS draft prioritization, area types are identified, and that the weighting for needs in these different area types is not the same. Area Type A, which includes the Northern Virginia region is proposed to be more heavily weighted for congestion mitigation, and improved reliability than other areas of the state. More data is also available in this area for transit, bicycle and pedestrian.</p> <p>Given the separate weighting for different area types, and availability of data for a variety of modes for the area type that includes Northern Virginia, the City requests that additional data for transit, bicycle and pedestrian trips in Northern Virginia be included in evaluation of needs for this area.</p> <p>If available data is not complete enough to be included in VTRANS, the City requests that the Commonwealth facilitate or prioritize the creation of more complete data sets including data for transit, bicycle and pedestrian trips. These data sets could be created potentially by VDOT or through some sort of university partnership, to better meet the needs of OIPI staff in statewide modeling efforts.</p>
35	Kerri Oddenino	City of Falls Church	11/25/2020	Email	<p>For the congestion mitigation performance measure, the City (of Falls Church) supports calculating person miles traveled in a way that includes trips taken not in an automobile. The current calculation for this measure uses vehicle miles traveled and converts to person miles traveled using average vehicle occupancy.</p> <p>The City would like to see a performance measure, such as person hours of delay or person trips that reflects trips taken using other modes. This would better capture first mile/last mile connections, active transportation trips which are being taken more frequently due to COVID-19 impacts. Many trips less than two miles in the Northern Virginia region are taken using modes other than the automobile.</p>
36	Kerri Oddenino	City of Falls Church	11/25/2020	Email	<p>For the improved reliability measure, for district priority needs in the technical guide document, only roadway reliability needs are included.</p> <p>Instead of using vehicle miles traveled and speed to calculate level of travel time reliability for roadway, the City (of Falls Church) instead requests that reliability of travel time for other modes also be assessed, perhaps using congestion duration as a performance measure.</p>
37	Kerri Oddenino	City of Falls Church	11/25/2020	Email	<p>For the Capacity Preservation measure, the City (of Falls Church) requests that the measure include facilities in addition to only highways. The measure and calculations as they are currently written relate to the VDOT Arterial Preservation Network, or the state-maintained portion of the National Highway System in Virginia and including some additional highways that facilitate connectivity.</p> <p>The City requests that capacity instead be considered at a person throughput level. There are a number of other facilities that have other capacity for person throughput including VDOT's network of streets in Counties and Cities. Other multimodal capacity is also available in the identified corridors.</p>
38	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) requests that the weighting for the regional network needs for transit, pedestrian, and bicycle access to activity centers be increased. As identified in numerous adopted regional and local studies, policies, and plans; trips made by foot, bicycle, and transit are a critical part of the solution to mitigating congestion in the Northern Virginia region.
39	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The relative weighting of the roadway and pedestrian safety needs categories could be reconsidered, especially given the needs and adopted policies of jurisdictions in the Northern Virginia region. Compact land use patterns that support pedestrian, bicycle, and transit modes of travel have favorable impacts on safety.
40	Kerri Oddenino	City of Falls Church	11/25/2020	Email	The City (of Falls Church) requests also increasing the weighting for Urban Development Areas, and pedestrian safety needs categories.

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41	Paolo Belita	Prince William County	11/30/2020	Email	Prince William County Department of Transportation staff concurs with the approved 2019 VTrans Mid-Term Needs. In addition to the quantitative measures, flexibility should be considered to focus on qualitative measures (local priorities/parallel projects).
42	Paolo Belita	Prince William County	11/30/2020	Email	Ensure safety measures/focus transitions to SMART SCALE scoring (20%)
43	Paolo Belita	Prince William County	11/30/2020	Email	Ensure overall congestion remains at 45% (congestion mitigation/Improvement reliability)
44	Paolo Belita	Prince William County	11/30/2020	Email	Find a way for the public to understand all the technical info (Overall, interactive process was very helpful)
45	Paolo Belita	Prince William County	11/30/2020	Email	Needs priority are based on current data, which can impact projects in the out-years, SMART SCALE funds are funded in the last 2 years of SYP.
46	Paolo Belita	Prince William County	11/30/2020	Email	VTrans Needs/Priority should not impact Revenue Sharing to a high degree which primarily focuses on local needs, especially at a 50/50 match
47	Paolo Belita	Prince William County	11/30/2020	Email	How do Priority Needs impact and translate the need for new roadway alignments (example: Extensions)?
48	Paolo Belita	Prince William County	11/30/2020	Email	How old is the data and how does changing conditions (Covid-19) impact future needs?
49	Paolo Belita	Prince William County	11/30/2020	Email	Why are not all pedestrian access to activity centers included? ex. Gainesville Activity Center, Innovation Activity Center
50	Paolo Belita	Prince William County	11/30/2020	Email	Will these Needs Prioritization impact future Highway Safety Improvement Program (HSIP) funding? Concerns with lack of funding for safety – Most programs focus on operations.
51	Paolo Belita	Prince William County	11/30/2020	Email	Will Pedestrian Safety Action Plan (PSAP) Structure Change?
52	Paolo Belita	Prince William County	11/30/2020	Email	Additional clarification may be needed on the map depicting Transit Access - Why are there major high priority gaps in Prince William County?
53	Chad Neese	Southside PDC	11/30/2020	Email	The Southside PDC's overwhelming concern is that rural areas, such as ours, will be left behind compared to more urbanized areas if the Policy Guide is adopted as is. The rationale for this is found by reading how needs are proposed to be prioritized on page 17 of the Guide. The two criteria are listed as "severity of the need" and "magnitude of the need". Magnitude of need is noted to take "into account the number of residents, vehicles, or persons impacted by the Need." For example, when needs are compared throughout the entire Richmond Construction District utilizing this criteria we're concerned that the vast differences in residents/vehicles between the Richmond area and Southside Virginia will produce highly skewed results in favor of the more populated areas. That naturally leads us to ask the following question: How much more severe would a need have to be in a rural area to score equal to or better than a less deserving need in an urban area that is simply pushed up the list because they have more residents/vehicles?
54	Chad Neese	Southside PDC	11/30/2020	Email	Issues such as this is why it's difficult for us to get rural areas interested in participating in transportation planning programs/projects. They already feel the deck is stacked in favor of the more populated areas, specifically stating so in the Guide does not help. Is there any way in which rural areas can be compared to other rural areas and have urban areas compared against other urban areas? Aren't we already going down that path to some extent anyway with transportation planning being addressed by MPO's for the more urbanized areas and PDC's for the rural areas?
55	Joe Bonanno	West Piedmont PDC	11/30/2020	Email	Comments from the Draft Policy Guide, Page 17: Magnitude of need is based on the number of persons, residents, and vehicles impacted by the priority locations. The WPPDC suggests using a different measure, such as share, percentage, or per-capita of persons, residents, and vehicles, since the number of persons, residents, or vehicles favors the largest urban areas over the smaller urban areas and the rural areas.
56	Joe Bonanno	West Piedmont PDC	11/30/2020	Email	(Comments from the Draft Policy Guide, Page 17) Also, with regard to those affected, consider including potential impact on disadvantaged populations (as a magnitude criterion).
57	Joe Bonanno	West Piedmont PDC	11/30/2020	Email	Comments from the Draft Technical Guide, page 33: within the row entitled "Applicable Need Categories," the WPPDC recommends adding Urban Development Area (UDA) to Regional Network (RN) for the following: Transit Access for Equity Emphasis Areas, Transit Access to Activity Centers, Pedestrian Access to Activity Centers, Bicycle Access to Activity Centers
58	Joe Bonanno	West Piedmont PDC	11/30/2020	Email	Comments from the Draft Technical Guide, Within Section 4.2 on Page 34, consider the following as was noted for the Draft Policy Guide, above: Magnitude of need is based on the number of persons, residents, and vehicles impacted by the priority locations. The WPPDC suggests using a different measure, such as share percentage, or per-capita of persons, residents, and vehicles, since the number of persons, residents, or vehicles favors the largest urban areas over the smaller urban areas and the rural areas.
59	Joe Bonanno	West Piedmont PDC	11/30/2020	Email	With regard to the Interact VTrans site, using the search criteria on the left side of the screen seems complex and confusing, with multiple criteria to choose from. Furthermore, the legend shows statewide priorities as well as priorities by construction district, even though only statewide priorities was selected twice (see the criteria selections at left on the screen shot below). Additionally, the screen shot below seems to indicate that map is not distinguishing between statewide and construction district priorities, even though both legends appear. Also, what does the highlighted segment on the screen shot indicate? The WPPDC recommendations is that Interact VTrans should be made more user-friendly.

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60	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>Pursuant to the proposed prioritization policy, after applying the severity/magnitude analysis and weighting across the different needs categories, this process will produce a single overall prioritization score for a given location. Although we appreciate the need to prioritize among the many locations across the Commonwealth that have transportation needs, we are concerned that having a generalized priority score for a location is of limited utility for transportation planning purposes if the specific needs for a priority location are obscured as a result. Flagging a location as an urgent priority without laying out its primary needs risks an outcome in which the solutions proposed for that location are not targeted to—or may even exacerbate—the problems that make it a priority, leading to ineffective investments of Virginia's limited transportation dollars.</p> <p>It will therefore be critical that decision-makers, transportation agency staff, and the public have easy and direct access to information that shows the specific needs for each prioritized location. This crucial information is currently distilled into an accessible and easily understandable format within the online InteractVTrans mapping tool, but the mapping will only be useful if the agencies and decision-makers know to access it and use it as a basis for developing potential solutions and deciding which projects to fund. We urge you to regularly emphasize the importance of accessing the specific locational needs information for prioritized locations, and to provide clear links to the InteractVTrans mapping where that information can be found, in all aspects of VTrans that discuss or incorporate the prioritized mid-term needs.</p>
61	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>The October 29 overview webinar contained an important acknowledgment that projects that are already programmed were not included in the data used for the mid-term needs prioritization. Although we do not object to the decision to omit such data, and we appreciate that this point was noted in the webinar presentation, we urge you to also underscore it in all materials in which the VTrans mid-term needs priority locations will be presented so that anyone using those priorities to help develop projects and make programming decisions is aware of this critical aspect of the prioritization.</p> <p>It will be important for decision-makers to also refer back to currently programmed projects to make sure one or more needs for a location are not already being addressed by another project or investment.</p>
62	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>We encourage OIPI to update the data for this prioritization process as often as it is feasible to do so to help capture changes to the identified needs as programmed projects are completed.</p>
63	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>SELC understands the importance of—and has long called for—incorporating risks from sea level rise, storm surge, and flooding into Virginia's transportation planning and programming, and we support the effort to give the issue greater consideration in the development of VTrans.</p> <p>The Commonwealth's transportation infrastructure already faces significant threats from the effects of climate change, including more frequent and intense precipitation, stronger storms, rapid rates of sea level rise, and higher storm surges. These threats and the damage they cause are only going to increase over the coming years and decades, and Virginia needs to fully consider them when planning and investing in our transportation system.</p> <p>However, the adjustment method currently proposed in the mid-term needs prioritization policy—awarding bonus points to locations that are particularly susceptible to these impacts, and increasing the bonus relative to the level of susceptibility—has a number of shortcomings. For one thing, it may promote short-sighted transportation investments in areas that will be routinely and heavily impacted by flooding and where such investments—and current and potential development served by such investments—are therefore unsustainable.</p> <p>Virginia should be thinking twice before making significant new expenditures on infrastructure in areas that will frequently be covered by water within the foreseeable future, and additional data, analysis, policy development, and collaborative planning with localities is needed to inform such decisions. In some cases, projects to adapt existing infrastructure to a changing climate and to add new infrastructure in areas experiencing or projected to experience significant climate impacts will make sense; in others it will not. The proposed adjustment makes no such distinction; it seems instead to simply put a thumb on the scale for projects in potentially risky locations.</p> <p>Further, the adjustment proposed in the draft policy would provide the bonus points even if the existing infrastructure in the flood-susceptible location is sufficient to accommodate the projected flooding. The bonus is awarded regardless of actual need. Even in areas where existing infrastructure is insufficient, there is nothing in the policy that ensures the projects ultimately pursued in the locations that receive the bonus will actually be designed to accommodate the projected flooding. And the policy provides no assurance that improvements built in these flood-susceptible locations would not make flooding worse by, for example, paving over wetlands or blocking the migration of marshes that help absorb floodwater. We understand the overall number of locations and extent of mileage that may be bumped up or down from one of the VTrans priority categories to another due to this proposed adjustment may be a relatively small amount, but in our view that does not justify including the adjustment in the policy.</p> <p>Moreover, we are concerned that the proposed approach of providing a scoring bonus to flood-susceptible locations without factoring in other crucial considerations such as the ones we note above may serve as a precedent for efforts to incorporate climate resilience into other state, regional, and local transportation prioritization efforts. We urge you to drop this adjustment from the mid-term needs prioritization policy at this time so that this complex issue can receive the further consideration it warrants. Along those lines, we think a better approach may be to award points to individual proposals at the programming phase based on how well they address the factors outlined above. Notably, SMART SCALE currently awards points under its Economic Development factor to proposals in areas that are prone to flooding if the project includes flood mitigation features. Perhaps the most appropriate next step is to review this aspect of the SMART SCALE methodology to see if specific changes or additional emphasis may be warranted.</p>

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64	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>While we understand that the SMART SCALE factors and the weighting of these factors are not a perfect fit that can be directly carried over into the mid-term needs prioritization process, we have some concerns with how far the proposed draft deviates from SMART SCALE in some respects. In particular, using the Transportation Demand Management (TDM) measure as the sole proxy for environmental quality misses the potential negative environmental impacts of transportation proposals that are captured by SMART SCALE (such as impacts on wetlands, habitat, and historic resources).</p> <p>We realize it is difficult to incorporate a factor for potential environmental damage into a methodology focused on assessing and prioritizing needs, but we urge you to consider other ways the mid-term needs prioritization policy can highlight when important environmental, historic, and cultural resources are located within or near a priority location. For example, the Department of Conservation and Recreation's ConserveVirginia map could potentially provide an initial screen for assessing when priority locations overlap with lands that have been determined by the Commonwealth to be top priorities for conservation due to their value for flood resilience, natural habitat, water quality, and cultural and historic preservation, in addition to other conservation categories. Including the ConserveVirginia map as an overlapping layer in the InteractVTrans mapping tool might be a fairly simple step toward helping to identify potential environmental risks to be aware of for each priority location, and helping to avoid advancing projects that cannot be granted necessary environmental permits.</p>
65	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>We are also concerned to see that much of the weighting given to land use factors in SMART SCALE appears to have been shifted to other categories—more specifically, from land use to safety in Category A areas, and to congestion mitigation in Category B areas. The proposed prioritization needs categories related to transit, bicycle, and pedestrian access, as well as TDM, seem to be most closely-aligned with the goals and objectives of SMART SCALE's land use factors, and thus seem like the most appropriate places for this land use weighting to be incorporated. We therefore urge OIPI to further evaluate ways to reallocate the weighting percentages so that more of the SMART SCALE land use weighting is placed in these other categories. In addition, further explanation and support should be provided for any proposed shifts of the land use factor toward safety and congestion mitigation.</p>
66	Morgan Butler	Southern Environmental Law Center	11/30/2020	Email	<p>We understand that one of the suggestions you have received during the public input process so far is to give some type of a bonus in SMART SCALE for projects that are proposed in areas identified as priorities in this VTrans mid-term needs prioritization process. We recommend against this approach and directly entangling these two processes, in part due to the number of areas identified above in which the factors evaluated for individual projects in SMART SCALE differ significantly from the broader evaluation of needs in this VTrans process—such as the latter's omission of environmental impacts and its substantially differing treatment of land use considerations. Further, we do not believe a proposal should receive a bonus in SMART SCALE simply for being located in an identified priority area. In line with one of the concerns we raise above, this risks prioritizing investing in a location, rather than investing in the right solution for that location.</p>
67	Cristina Finch	RVARC	11/30/2020	Email	<p>Observing that the characteristics of an IEDA fall under the umbrella of the UDA Travel Market, and assuming that IEDAs will not be a separate needs category in VTrans, it is possible that a locality could designate an IEDA without having designated a UDA. If, in the next round of SMART SCALE the designation of an IEDA is not a standalone need, can an application be screened in if there is no UDA.</p>
68	Cristina Finch	RVARC	11/30/2020	Email	<p>In the characteristics of the Regional Networks Travel Market, VTrans Activity Centers are included in the description. What, if any distinctions are there between these and Multimodal Centers and Districts, as defined by the DRPT Multimodal System Design Guidelines? Further if any discrepancies exist, and an MPO has adopted MM Centers and Districts, what is the prevailing construct when evaluating Regional Networks through the SMART SCALE process?</p>
69	Cristina Finch	RVARC	11/30/2020	Email	<p>When describing "high volume" as a characteristic of the CoSS travel market, it may be worth stipulating the relativity of high volume to either lesser roadway classifications, or to other CoSSs.</p>
70	Cristina Finch	RVARC	11/30/2020	Email	<p>It appears the UDA Needs Categories are not included in the prioritization – how are these needs included in the VTrans prioritization? If the localities are responsible for prioritizing needs within UDAs, should there be a similar relationship between MPOs/PDCs the RNs?</p>
71	Cristina Finch	RVARC	11/30/2020	Email	<p>Step 3 – In general, since transit is considered an essential service it seems Transit Access to Activity Centers should be given a higher weighting across all area types and an even higher weighting for the Transit Access to Equity Emphasis Areas.</p>
72	Cristina Finch	RVARC	11/30/2020	Email	<p>It doesn't seem that equity is addressed in the prioritization process aside from the specific need category "Transit Equity Emphasis Areas". Consider also including equity as a factor in step 4 – influencing factors where any need located in an equity emphasis areas is given an adjustment.</p>
73	Daniel Butch	Albemarle County	11/30/2020	Email	<p>There are 2019 Mid-Term segment needs identified for Street Grid (UDA) which are not District priorities which we feel should be which are made aware via comment on Interact VTrans map. Specifically: The US 29/Rio Rd area as well as the downtown Crozet area.</p>
74	Daniel Butch	Albemarle County	11/30/2020	Email	<p>District Draft needs to include specific areas for District priority need for Pedestrian Infrastructure/sidewalks & Access- as yes; comments made in Interact VTrans.</p>
75	Daniel Butch	Albemarle County	11/30/2020	Email	<p>Within UDA on roads in residential neighborhoods that don't have pedestrian facilities- why are these not priority District needs? Made comments on Interact Vtrans for locations.</p>
76	-	-	11/30/2020	InteractVTrans	UDA Street Grid need for Rio/29 - Hillsdale Connection from VTRANS segment Needs to Priorities.
77	-	-	11/30/2020	InteractVTrans	(Mill Creek Drive) Within UDA on roads in residential neighborhoods that don't have ped facilities- why are these not priority District needs?
78	-	-	11/30/2020	InteractVTrans	(Soloman Rd at Hydraulic Rd.) Within UDA on roads in residential neighborhoods that don't have ped facilities- why are these not priority District needs?
79	-	-	11/30/2020	InteractVTrans	(5th St. EXT at Old Lynchburg Rd.) Albemarle County identifies Pedestrian Access (RN) as a priority

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80	-	-	11/30/2020	InteractVTrans	(Avon St. near I-64 overpass) Albemarle County identifies Pedestrian Access (RN) as a priority on Avon St Extended. Also, should be included in Urban Development Area.
81	-	-	11/30/2020	InteractVTrans	We ask to recognize Berkmar Dr from Hilton Heights to Conner Dr as Segment mid-term needs that should be prioritized for Need for Street Grid (UDA) /connectivity.
82	Ann Cundy	VAMPO	11/30/2020	Email	It is unclear how equity for transportation disadvantaged individuals will be considered for all modes; therefore, we suggest including equity as an influencing factor in Step 4.
83	Ann Cundy	VAMPO	11/30/2020	Email	Overall, the VTrans Needs Identification and Prioritization Process at the level of Regional Networks (RNs) is not meaningfully built upon, or aligned with, the comprehensive regional needs assessments and priorities of MPOs. Regional needs and their prioritization should reflect regional (i.e., MPO) processes and planning efforts in the same way that local needs for Urban Development Areas (UDAs) are prioritized by localities.
84	Ann Cundy	VAMPO	11/30/2020	Email	The delayed webinars, and the one-month review period for the MidTerm Needs Prioritization methodology and recommendations did not provide adequate time to review the materials, take recommendations to our committees and Boards for approval, and present them as formal comments.
85	Ann Cundy	VAMPO	11/30/2020	Email	There has been a lack of clarity from the State on the policy implications of the Needs Prioritization, specifically on VDOT's ability to support the preparation of technical materials that are required as part of the application for Smart Scale funding for lower ranking priorities.
86	Ann Cundy	VAMPO	11/30/2020	Email	Based on the location of Needs around the state, we are concerned that the outcome of this prioritization process will be less equity for accessing resources (i.e., to access studies, project development efforts) among different areas of the state. This inequity is of particular relevance for the Corridors of Statewide Significance (CoSS): a need in a smaller urban or rural area will almost always lose if compared to the same need in a larger urban area.
87	Richard Roisman/Dennis Leach	Arlington County	11/30/2020	Email	One broad solution to improving this alignment is to have OIPI reconsider allowing the expanded use of local data in the computation of the Construction District Prioritization Strategies, rather relying solely on statewide data sets. Northern Virginia has a complex transportation network, and local data are available to provide detailed coverage of our trail and bike lane network, roadways, bus routes, and rail transit. These data provide the granularity appropriate to the area and will improve the predictive capabilities of VTrans' analytical and decision-support framework for mid-term priorities..
88	Richard Roisman/Dennis Leach	Arlington County	11/30/2020	Email	Why is Road Safety (15%) weighted at three times the importance of Pedestrian Safety (5%)? We strongly urge you to consider making these weights equal for Northern Virginia.
89	Ada Hunsberger	Central Virginia MPO/Central Virginia PDC	11/30/2020	Email	The prioritization of needs into four categories has brought about concern regarding the limitations that being identified as priority 3 or 4 will present. It seems that many of the Priority 1 and 2 needs have been studied extensively, but there are concerns that those needs identified in Priorities 3 and 4 will not be able to easily be studied due to their ranking. In addition, there is concern that VDOT staff and resources will only be allocated to Priority 1 and 2 needs, which will further limit our capacity to study and receive funding for projects that address needs in categories 3 and 4.
90	Ada Hunsberger	Central Virginia MPO/Central Virginia PDC	11/30/2020	Email	The implications of the policy on other funding sources (i.e. Smart Scale, HSIP, etc.) have not been clearly defined. While OIPI has indicated that these decisions will be made at a later time, we urge you to allow local agencies adequate time to comment and participate in that process in the future
91	Ada Hunsberger	Central Virginia MPO/Central Virginia PDC	11/30/2020	Email	This policy limits the local ability to identify and prioritize projects based off both local qualitative and quantitative data. By incorporating qualitative data from public outreach, surveys and engagement, as well as the quantitative data found within long range plans and local transportation studies, the VTrans Needs Prioritization would be a more balanced look at statewide needs.
92	Ada Hunsberger	Central Virginia MPO/Central Virginia PDC	11/30/2020	Email	The criteria presented for prioritizing needs gives considerable leverage for urban communities to have their needs addressed over rural communities. Even with adjustments to the weighting for certain categories (such as congestion) within the construction district priorities, smaller localities will be disadvantaged by these criteria. Because of this weighting structure, and the already limited monies allocated to rural planning, it will become even harder to receive funding for rural studies, thus making it harder to receive funding. While the needs of rural communities may seem less impactful at the statewide level, bottlenecks impacting freight movement in rural localities have statewide economic impacts. Therefore, we recommend incorporating more criteria which addresses rural transportation needs within the policy.
93	Ada Hunsberger	Central Virginia MPO/Central Virginia PDC	11/30/2020	Email	Additionally, the only criteria that integrates equity is "Transit Access to Activity Centers", which relates mostly to urban communities. However, since equitable development is a top priority for urban and rural communities alike, we recommend allowing equity to be considered into Step 4: "Adjust Priorities for Influencing Factors". This would allow projects which serve transportation networks in marginalized communities to receive an extra point, but not penalize projects which do not serve those communities.
94	Ada Hunsberger	Central Virginia MPO/Central Virginia PDC	11/30/2020	Email	The short turnaround time between the presentation to our technical committee and deadline for comments has presented some challenges in educating the local representatives and garnering their feedback. The rural localities with the most limited resources/staff are the ones that will likely be most marginalized by this, and the short timeframe for them to comment further disenfranchises them.
95	Bonnie Riedesel	CSPDC	11/30/2020	Email	Several level 1 and 2 needs in the SAWMPO and HRMPO regions have been addressed by funded SMART SCALE applications, recent studies and/or, current SMART SCALE applications. There are still lower priority needs in our region that could be eligible for further study and project development. We request that OIPI clarify the relationship between the priority levels and eligibility for state study funding. Will the Priority 3 and 4 needs be eligible for studies?
96	Bonnie Riedesel	CSPDC	11/30/2020	Email	The alignment of the availability of state study funds with CoSS, RN, and Safety needs limits the ability of rural areas without RNs to conduct studies in partnership with VDOT.
97	Bonnie Riedesel	CSPDC	11/30/2020	Email	Rural areas' eligibility for studies to advance projects hinges on how well-funded the new GAP program is, and whether a need is in a UDA. How much funding will the GAP program have each year for technical assistance? Will the program be available each year?

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98	Bonnie Riedesel	CSPDC	11/30/2020	Email	PDC Rural Transportation Planning annual funding can help assist rural areas up to a point, but we only receive \$58,000 from VDOT each year. This annual grant award has not been increased in over 20 years, so the PDCs have limited resources to help rural localities with larger studies.
99	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	We propose that Office of Intermodal Planning and Investment (OIPI) and the Northern Virginia Transportation Authority (NVTA) work towards one uniform process for prioritizing projects in for the NOV A Construction District. Having separate processes is not beneficial to NOV A and can result in different outcomes for the same needs or project.
100	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	The prioritization of mid-term needs is a data driven process and the data that drives the process needs to be current, relevant, and updated regularly. What we have seen so far is that the data being used in Loudoun County is not current, and we understand that there is no schedule or assurance that the data will be updated before its use in the next round of Smart Scale.
101	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	The relevancy of the data is concerning as it is based on existing conditions (2018 or 2019 data) and does not account for rapidly changing conditions such as what is occurring in Loudoun County. By 2027 the population will have grown by 14% and employment by 25%, over existing conditions. In 2021 Metrorail will begin operating in Loudoun County and there does not seem to be any accountability for its impact on our transportation systems
102	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	The initial outcome of the Statewide prioritization process shows that mostly Interstates rank in the High categories. Interstates have their own funding sources now with the "I-81 funds" provided in the last General Assembly and should be excluded from the prioritization process.
103	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Before the prioritization process can be finalized, there needs to be clarification of how the process will be used to select projects for funding by VDOT and or DRPT, such as in future Rounds of Smart Scale and the next Round of Revenue Sharing.
104	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Congestion Mitigation - Please provide an example of the Travel Time Index (TTI) calculation for congestion mitigation and clarify whether Step 4 is supposed to be the weighted average of weekday and weekend hours.
105	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	As illustrated if Figure 1, queue spill-back/spillover likely triggers false-positives, ranking upstream segments as having higher priority than the downstream 'causal' locations. This becomes more of an issue as segments get smaller (length of segments vary widely in the VTrans files). It is recommended that the PECC of neighboring roadway segments be considered in the calculation: high values of upstream PECC should increase priority of a downstream segment. This becomes more complicated when queue spills back beyond more than one segment. Please also consider implementing a similar adjustment for scores calculated using TTI values.
106	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Congestion Mitigation - How do severity measures compare between PECC and TTI methods? Is this fair? It is recommended to adjust PECC and TTI scores at this stage to ensure similar levels of travel time delay are comparable. It is not expected that normalization of PECC and TTI scores will accurately portray comparable travel time delays. Please illustrate that the methodology correctly equates similar levels of travel time delay in the prioritization methodology documentation using example calculations.
107	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	The 'Magnitude' for Congestion Mitigation scores is dependent upon segment length; however, segment length is sometimes established arbitrarily, with longer segments generally found on limited access facilities between interchanges. This prioritizes limited access facilities. For example, if a segment is a mile long and VMT is not reported, it will receive a magnitude score of 7,100 VMT. If the facility was divided in half, each half would receive a magnitude score of 3,550. It is recommended to utilize the average VMT-per-XX distance instead. In our example, if we were using a 'per 1 mile' measure, the mile-long segment would have a VMT of 7,100 VMT-per-mile and, if the segment were divided in half, each half would also receive a magnitude measure of 7,100 VMT-per-mile.
108	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Congestion Mitigation - The selection of 7,100 vehicle miles travelled for all null and VMT=0 segments should, ideally, be scaled according to the facility type and number of travel lanes of the segment.
109	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Congestion Mitigation - Consideration of Severity and Magnitude Criteria calculations should reflect the adjusted PECC and TTI scores as well as the VMT-per-XX distance. Since the 'Low (Score 1)' is the bottom 50%, it is suggested that minimum scores be replaced with the 10th percentile scores prior to normalization to reduce the influence of minimum-value outliers.
110	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Congestion Mitigation - Please provide a table showing the mileage of segments in each of the categories (Score 1 through 7) that have been assigned using the TTI verses the PECC methodologies. Is one methodology favored over another? Does the bias make sense?
111	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Transit Access to Activity Centers - The methodology converts median transit commute time in each bin to a distance value by multiplying it by the average travel speed of a bus (12 mph); however, given that the question stated "mark (X) the box of the one used for most of the distance", the "Public Transportation" commute time includes: a) Time to walk to/from the bus-stop, b) Wait time at the initial stop, c) Wait time at a transfer. The corresponding distance should be much smaller. Literature assumes that people are willing to walk 5 minutes to get to a bus stop and 10 minutes to get to a Metrorail station. Literature assumes that people will need to wait half a headway; however, bus arrival time applications may significantly reduce initial wait times.
112	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Pedestrian Access to Activity Centers - The methodology uses 'Walk Score' to develop its severity measure. Walk Score measures the walkability to amenities in a neighborhood using existing walking routes ... so if you already have lots of sidewalks in a neighborhood, the segments within that area will receive higher priority. The methodology limits the degree to which a well-built-out neighborhood can influence the scores by only considering segments with an average score below 70. Our review identified that some links along Leesburg Pike and Chain Bridge Rd in Tysons Comer have weighted average walk scores above 70 but are listed by VTrans as "Very High". Please provide an explanation.
113	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	Pedestrian Access to Activity Centers - The methodology still favors building links near neighborhoods with already good pedestrian infrastructure and other 'resource rich' neighborhoods; therefore, equity of infrastructure investments is concerning.

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114	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Pedestrian Access to Activity Centers - The methodology uses a weighted average based on census block area of the "Access Walk Score" to census block centroids. This means that 'barrier' roadways get prioritized as there is very little opportunity to cross and so there can be a large dichotomy between walk scores on either side of the roadway.</p> <p>For example, the draft VTrans prioritization methodology assigns Eastbound Route 7 segment between City Center Blvd and Cascades Parkway a "Very High" to "High" need priority for pedestrian access but the Westbound segment is assigned a 'low' priority. This is because the development north of Route 7 has a very high walk score and south of Route 7 has a moderate walk score. The average walk score based on their proposed methodology must cut the westbound segment because it is over 70; The average walk score for the eastbound segment is likely just under the '70' walk score cut-off. The actual need for pedestrian facilities at this location is questionable. A preferred methodology would be to look at the maximum absolute gradient of walk scores along a segment, as a steep gradient would indicate a strong need for pedestrian facilities along that segment (i.e. Potomac View Road, north of Route 7).</p>
115	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Pedestrian Access to Activity Centers - The methodology calculates density based on the sum of employment and population density in the block that the segments' centroid intersects. This means that densities for longer segments are more likely to be incorrect, particularly if they pass by towns or villages (i.e. the northbound segment of Fairfax County Parkway has a centroid closest to Reston but is actually quite long). Furthermore, blocks are usually defined by roadways, particularly principal arterials on their edges. Preferred method: use a weighted average of densities within 200 feet of the corridor.</p>
116	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Pedestrian Access to Activity Centers - The methodology assigns the following values for roadway functional classification: 7 points for Principal Arterial, 3 points for Minor Arterial, 1 point for all other functional classes, and then multiplies it to the severity and population/employment densities to determine the final "Pedestrian Access to Activity Centers" score. Given that most pedestrian trips are local in nature, why are we outright prioritizing pedestrian infrastructure for principal arterials? No justification was provided in the technical report. No justification was provided for the chosen point values: why is Principal Arterial 7 times more important than collector roadways, particularly for pedestrian access? It means that given the same walk score, a principal arterial with less than half the density will rank higher than a minor arterial. Likewise, given the same walk score a minor arterial with a density less than half that of a collector road would have priority. This does not make sense for measures of pedestrian activity.</p>
117	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - The methodology awards a greater number of Severity points when a segment is proximate to a transit stop. Given that average bicycle commute speeds are comparable to average bus speeds, is it equitable to prioritize a corridor with multiple mode options over a corridor that only has one mode option? Please consider awarding higher priority to locations that are within 3 miles and not within a 5-minute walk of an activity center or transit stop.</p>
118	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - Repeat of concerns outlined in 11 d above (The methodology calculates density based on the sum of employment and population density in the block that the segments' centroid intersects. This means that densities for longer segments are more likely to be incorrect, particularly if they pass by towns or villages (i.e. the northbound segment of Fairfax County Parkway has a centroid closest to Reston but is actually quite long). Furthermore, blocks are usually defined by roadways, particularly principal arterials on their edges. Preferred method: use a weighted average of densities within 200 feet of the corridor.)</p>
119	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - Please provide justification as to why roadway functional classification is a measure of "magnitude" as opposed to 'severity' and for the values chosen. Assuming the same population and employment densities, are bicycle facilities along "Other Principal Arterials" between 5 and 7 miles from an activity center more than twice as valuable as bicycle facilities along a collector within 3 miles of an activity center? Why is roadway functional classification more influential than presence of a transit stop or difference between activity centers?</p>
120	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - The methodology indicates that roadway segments with no documented bicycle infrastructure should receive a score that is the product of the severity and magnitude measures while other roadway segments should receive a priority score of 1 (Low). The draft results listed segments along Dranesville Road just south of Route 7 (need segment ID) as 'Medium Priority' and Fairfax County Parkway segments north of the Greenway (need segment ID 125701) received a "Very High"; however, the Virginia Bicycle Facility Inventory indicates that these roadways are equipped with Shared Use Paths. Similarly, Segment ID 109404 (King Street) is listed as having "High" need; however, the Virginia Bicycle Facility Inventory indicates these roadways have "Shared Lane" and "Designated Bike Lane" facilities. Please clarify what is meant by "no documented bicycle infrastructure" and clarify how scores are awarded to roadway segments with documented bicycle infrastructure.</p>
121	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - While the Virginia Bicycle Facility Inventory does specify whether a facility is present, it does not indicate whether that facility is sufficient. For example, segment ID 218800 has a 5-foot asphalt trail. It is listed as a Shared Use Path in the Virginia Bicycle Facility Inventory; however, it will need to be upgraded to reflect the 10 foot Shared Use Path standard width as called for in Loudoun County's 2019 Comprehensive Transportation Plan.</p>
122	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Roadway Safety - Severity and Magnitude scores are averaged instead of using the product of Severity and Magnitude scores (as was done for the previous need categories). If not adopting the recommendation noted in 13a, please provide justification as to the deviation or consider using a methodology consistent with other need categories.</p>
123	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Transportation Demand Management - The methodology considers inter-RN trips. Does this include all trips that cross a construction district border (i.e. Maryland into NOV A Construction District) or just between Virginia construction districts?</p>
124	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Transportation Demand Management - Concerns like those outlined for the "Prioritization within Congestion Mitigation Need" Category: Please indicate how responses to those concerns correspond to the Capacity Preservation prioritization methodology.</p>

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125	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Transportation Demand Management - The proposed methodology is basically the same methodology as the 'Congestion Management' need category but applies to more links throughout the construction district. This means that the Congestion Management need category is essentially weighted at 30% and Capacity Preservation is essentially weighted at 12.5%.</p> <p>It is unlikely that "congested corridors" are an adequate indicator of funding allocation for transportation alternatives that would manage demand. Instead, there needs to be looking significantly 'upstream' for opportunities to provide additional and viable transportation mode options. Furthermore, Transportation Demand Management is the need category intended to fulfill Goal E: Healthy Communities and Sustainable Transportation Communities. Please address how the proposed methodology, which prioritizes congested corridors, would support a variety of community types promoting local economies and healthy lifestyles that provide travel options, while preserving agricultural, natural, historic and cultural resources or address the objectives of: (E.1) reduce per-capita vehicle miles traveled and (E.3) increase the number of trips traveled by active transportation.</p>
126	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Transit Access to Activity Centers - The methodology utilizes the same definition of transit deficit as used to identify needs. We understand that we cannot change the 'Needs' calculation at this point; however, we encourage an alternate methodology to determine 'transit deficit' used in the prioritization of those needs.</p>
127	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - For Metrorail stations the journey from a platform to bicycle parking is typically greater than 200 feet. It is recommended to increase the buffer for BRT lines and fixed-guideway transit stops or to use a polygon to represent BRT and fixed guideway transit stations and apply the buffer from the station's perimeter.</p>
128	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Roadway Safety - The methodology uses the Potential for Safety Improvement (PSI) ranking within each district as the severity score. According to VMTP 2025 Needs Assessment documentation, the ranking within each district used the number of years PSI was greater than zero (weighted by 3), the number fatal and injury crashes during those years (weighted by 5), and the total crashes during those years (weighted by 1). The weighted scores for intersection and segment locations within each district was sorted and ranked by percentile. Given that the PSI ranking has already been adjusted to reflect the number of fatal and injury crashes, it is recommended that the PSI ranking be directly converted to the VDOT Construction District-specific categorizations for Roadway Safety needs within the (Regional Network) RN.</p>
129	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Bicycle Access to Activity Centers - The methodology adopts a buffer of within 200 feet of a transit stop. How is this buffer meaningful for bicyclists?</p>
130	Bob Brown/Joseph Kroboth	Loudoun County	11/30/2020	Email	<p>Loudoun County is currently doing a Corridor Study for Route 9 from Route 7 all the way to the West Virginia Line. We are trying to see how the work to date can help us in our study. We have noticed that across Corridor the Transportation Demand Management need varies from N/A to Low to High on some links of Route 9. Some segments have big Safety needs and others do not. There is also variability in the Congestion need.</p>
131	Curtis Smith	Middle Peninsula PDC	11/30/2020	Email	<p>The draft prioritization methodology fails to address the stress being placed on our rural transportation infrastructure from tidal flooding and sea-level rise and stormwater flooding from increases in precipitation extremes and inadequately designed or maintained drainage ditches. Being that sea level rise is considered only as an influencing factor in Step 4 of the methodology, the vast majority, if not all roads vulnerable to flooding and inundation are deprioritized by default in the methodology due to lesser traffic volumes. Again, the secondary roads provide critical access to our natural resource based economies and the value of the traffic on these roads is not captured effectively in the methodology. These worsening conditions are creating compounding issues for the transportation needs of our rural coastal communities and industries.</p>
132	Judy Swystun	Hampton Roads Transportation, INC	12/1/2020	Email	<p>This does not address going beyond the ADA guidelines for the disability community. I know we service a lot of people when Transit is not available. Also, we do on-demand wheelchair accessibility.</p>
133	Judy Swystun	Hampton Roads Transportation, INC	12/1/2020	Email	<p>I think there should be some sort of mention of Private/Public partnerships. We approached HRTransit with a multimodal sample a few years ago after attending the Transportation Research Board meeting in Colorado. Subsequently, we had a Microtransit Software firm show some great results to HRTransit on how Microtransit is being utilized in Texas.</p>
134	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>Kudos on the policy and technical guides. I really thought the technical guide was easy to follow and coupled with the presentation did a good job explaining the prioritizing process.</p>
135	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Statewide Priority Locations) Congestion Mitigation, I-95 prioritized needs do not extend through the Route 10 interchange.</p>
136	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Statewide Priority Locations) Reliability - Roadway: Only 1 segment (Route 288 between Route 1 and I-95) prioritized based on reliability, expected I-95 near Route 10 interchange; No prioritized needs on I-95 through Chesterfield?; This impacts the "Access to IEDA" score.</p>
137	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Statewide Priority Locations) Reliability - Rail: This is a medium/high priority need for I-95 & Route 288 in Chesterfield; This category seems weighted high when compared to congestion and safety for I-95 & Route 288.</p>
138	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Statewide Priority Locations) Roadway Safety: There are no roadway safety prioritized needs on I-95 in Chesterfield; Please verify I-95, particularly the high crash segment between Route 10 and Route 288.</p>
139	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Statewide Priority Locations) TDM: This is a high priority need for I-95 & Route 288 in Chesterfield; This category seems weighted high when compared to congestion and safety for I-95 & Route 288</p>
140	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Construction District Priority Locations) Congestion Mitigation: I-95 prioritized needs do not extend through the Route 10 interchange; No prioritized needs on Route 150 (Chippenham Parkway)?</p>
141	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Construction District Priority Locations) Reliability - Roadway: No prioritized needs on I-95/Route 150/Route 60 corridors? This impacts the "Access to IEDA" score</p>
142	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Construction District Priority Locations) Access to IEDA: Concern over lack of prioritized needs related to the following IEDA sites, Meadowville Technology Park, James River Industrial Center and Watkins Centre</p>
143	Chessa Faulkner	Chesterfield County	12/14/2020	Email	<p>(Regarding Draft Construction District Priority Locations) Roadway Safety: There are no roadway safety prioritized needs on I-95 through Chesterfield; please verify I-95, particularly the high crash segment between Route 10 and Route 288.</p>

Comments - Policy for the Prioritization of the VTrans Mid-term Needs

Comment Period: October 29, 2020 through November 30, 2020

ID	Name of Submitter	Submitter's Affiliation (if applicable)	Date Received	Method Received	Comment
144	Chessa Faulkner	Chesterfield County	12/14/2020	Email	(Regarding Draft Construction District Priority Locations) TDM: This category seems weighted high when compared to congestion and safety.