



Catalog of Public Comments on Draft TRAC Scoring Criteria

UPDATED December 4, 2008

Transportation Factors

Road, Urban Transit and Intercity Passenger Rail, Water Port and Rail:

It appears that there will be less emphasis placed on traffic volumes and congestion, since the points for ADT have been completely removed and the points for V/C ratio have been reduced from 20 to 10. That seems contradictory to the definition of a Major New project, since increasing capacity and reducing congestion are still listed as two of the purposes

The V/C delta between the before and after proposed project could yield a better metric for decision

The idea of incorporating some measure of return on investment is good, but going from no measure previously to 20% of the new scoring is questionable to me without an understanding of how realistic the statewide travel demand model will be as a measure

Thought it was a good idea to use some customized values for transit and intermodal proposed projects

These transit rail projects will generally be in urban areas which will automatically compete with the roadway projects for limited funding.

The evaluation of a public transit project based on a traffic benefit criteria may not be appropriate as not all transit projects are undertaken with traffic benefits as a primary goal. For example, if a transit project is designed to benefit low income area(s) with little or no access to automobiles and results in increased mobility, job access, etc is the ridership level related to traffic impact important? The ridership levels cited make sense only related to highway capacity and seem unreasonable compared to overall transit system wide measures. Better measures of mobility might be: increase in system or corridor capacity; decrease in person trip times, change in mode split for a target area. Ridership is acceptable to use, but not related to a highway capacity measure

Scale and point structure for Peak Hour Ridership needs to be reviewed or restructured. Given the low mode share of transit in Ohio, the 3,300+ peak hour ridership number in the scoring criteria may be too ambitious a threshold to meet and achieve maximum points.

Can an individual transit project ever capture 3300 riders in the peak hour? That is a high number even for the entire local transit network?

Could you provide a methodology for the 3,330 passengers that is used for maximum points under the Peak Hour Ridership point category?

The point structure for peak hour ridership should be reconsidered as it is unrealistic for any transit authority, with the possible exception of Cleveland, to meet it.

Very appreciative of the fact that the proposed process has customized factors for transit, commented that previously they didn't pay any attention to TRAC

A 50%+ reduction of trucks under the truck percentage scoring table was only worth 5 points. A reduction that significant has a great impact on pavement service life and should be worth more points.

Scale and point structure for Truck Percentage Scoring needs to be reviewed or restructured. There is only one segment of interstate roadway in the State of Ohio that meets the 50%+ criteria. The system wide interstate truck percentage average is 17%.

The Truck % Scoring for Road Projects appears to have too high of a maximum value. Percentages over 30-35% are exceptionally high and should be considered for full value of 5 points.

The Intermodal Truck % criteria, if based upon an individual facility could yield skewed results if the volumes are not high to begin with. More weight should be given to regional or subarea numbers compared to an individual facility.

Safety should carry more weight in the scoring criteria. Can the points for safety be increased?

Reducing the number of safety points...seems questionable

I believe some points should be given to projects that eliminate safety hazards such as non-standard typical section roadways, and both vertical and horizontal curves with poor sight distance. However, improvements projects that have a crash history should get more points in this category.

Additional information is needed to facilitate comment (Safety criterion)

This appears to be a reasonable approach to evaluating the relative importance of (transit and intercity rail) projects.

Some intersections near schools or along major, high-speed highways with limited crossing points that are at grade intersections should get more safety points because of the higher school bus counts using those intersections. For instance, the US 33 intersection at Carroll. School buses crossing US 33 to the Bloom half of the Bloom Carroll Local School District must use that intersection because of the limited points to cross US 33 from Carroll to Bloom Township.

How do you score a project which involves multiple modes?

- Is it a hybrid scoring approach, which ever point score is higher is what you use?

Intermodal criteria and projects should include air freight.

Not only percentage of trucks, but also number of trucks. Looking at truck percentages may be misleading for lower volume routes.

From a statewide aspect, the concept of completing high priority corridors should be recognized, as well as the elimination of freight bottlenecks across all modes.

As with v/c ratio and truck volume, higher VMT reduction projects should have a higher public benefit than lower VMT reduction projects. A two-dimensional approach would address this. Note it would be possible to build a transit facility in an uncongested corridor and still see a reduction in VMT. Reducing VMT in this case is not as beneficial as reducing VMT in a congested corridor.

I would probably like to see the sub-scoring criteria in relation to public transit and commuter rail versus highway projects as I believe that with proper planning and education we can change the public's perception that mass transit is for the disadvantaged.

Suggested that VMT reduction be considered under Road as well as under Public Transit & Intercity Passenger Rail.

Public Return on Investment

Were mildly concerned that the Benefit/Cost scoring would be difficult to keep objective.

It was noted that in the Benefit/Cost scoring, a roadway project needed a score of 5.0 or more to achieve the maximum 20 points while a transit project need never achieve a B/C of greater than 0.8 to reach the maximum points.

The description of the purpose of this scoring indicates the intent is to “quantify the benefit of the proposed project, so that public dollars are generating the greatest return possible.” Because of the severe limitations in funding available to Ohio, it is incumbent upon ODOT to select projects which have the best chance of improving the state’s economy and restoring prosperity to its residents. There should be two elements to the congestion assessment. While v/c shows the relative congestion level of deficiencies, it does not necessarily direct funds to the project with the greatest return possible. A project carrying a higher volume of traffic will have a greater benefit to the motoring public than a lower volume project of the same congestion level. Please note the proposed scoring criteria includes volume measure in the transit and freight categories (even for freight road projects), but not for roads. This seems inconsistent. Transportation benefit-cost ratio addresses whether the possible increased cost of solving the higher volume project has a higher benefit than a lower volume project. This problem could be overcome by using a two-dimensional point system for v/c-volume. One axis contains v/c and the other volume.

What B/C tool is being used for calculating this ratio?

- This tool should be used by ODOT for all **three** types of projects and not just road and freight, to bring conformity to the scoring process.
- If different sponsors start calculating their own B/C ratio scores, such as for transit, there may not be any conformity to the scoring process?

Can the cost portion of the B/C ratio be reduced to the cost requested from TRAC and not just the full project cost?

- This will give more credit to local investment and funding.

The B/C ratio should consider the on-going costs of maintenance.

How will Benefit/Cost be calculated for road projects?

This is a criterion that would greatly benefit from transparency in methodology. For example, does “crash reduction factors” mean reductions in accidents or rates? If the latter, we would suggest a greater reduction in accidents, adjusted for severity, is more beneficial than a lower reduction in accidents even if the rate reduction is higher.

We would also like to suggest allowing additional modeling methods in addition to FTA’s SUMMIT software for B/C calculations. Sometimes, FTA’s methodology is not transferable from the New Start process.

There was discussion about the Benefit/Cost ratio being included in the Economic Growth factor to capture the Benefits of the project, from not just a transportation side but, from an economic side.

Air Quality

Statewide air-quality models are not sensitive for small-scale analysis. (e.g., transit component such as small local bus systems are not recognized). Regional models would serve better.

Including a measure for air quality is appropriate

Under the Transportation Factors ~ Air Quality, there were several questions raised as to whether adding a lane to an existing facility would always lead to a score of zero for air quality. Further, the group was interested as to what type of transportation project would score 5 points in this category, expecting that it would primarily be transit.

The Air Quality scoring does not indicate a sliding scale. Will one be developed as measurements are established?

Is the air quality analysis being based on certified traffic for the specific project? If so, current experience with project specific certified traffic has revealed that there may be major differences in the traffic numbers between the local model and the state model. Additionally, if other project sponsors, for urban transit and intermodal freight, provide their own emission reduction factors, there may not be any conformity in the scoring process.

Projects in non-attainment areas should get more points for reduction in ozone precursors. However, in light of our national oil problem, the reduction in fuel consumption should garner more total points than the reduction in ozone precursors. Fuel 3 points and ozone reduction 2 points.

In many parts of the state small particulate emission standards have been exceeded. Including this pollutant should also be considered.

Suggested increased points for emission reduction and air quality would reward green approaches.

Intermodal Connectivity

Under "intermodal connectivity" in the last sentence "destination" should be replaced by "origination or destination".

This criterion should assess how much intermodal activity is generated by the project. How many people, containers, or tons of freight change mode? Also, this criterion seems subject to gaming by a project sponsor including a small intermodal component to the project.

Will horse and buggy count toward intermodal connectivity points?

Community and Economic Growth and Development Factors

General

The encourage for funding relative to economic development , via scoring , is a good step , if we acknowledge the existing sites, as mentioned above.

I hope that the TRAC committee adopts policies that as proposed regarding economic development , translates into the consideration of brown fields having some priority over green field development. In most cases the public dollars already spent for existing brown fields become under utilized if the existing infrastructure is ignored as an asset.

Consideration should be given to formally including the Department of Development as an agent of the TRAC and ODOT in evaluating criteria in this section.

The state may wish to reward projects which improve certain corridors that make a significant contribution to the state's economy, for example, I-70, I-80, or I-90 or serve a portion of the state with a sparse expressway/freeway network such as US 33.

From a clarification standpoint, the definition of a project's "footprint" can be very ambiguous and needs to be more defined and clearly measurable across the state. Do improvements to a bottleneck on a major rail line or interstate have an international footprint? Many valuable projects can have a ripple effect across a large area; the method used to determine the footprint must be established and uniform.

A potential addition to the criteria under economic development is the proximity of the project's footprint to freight corridors. The freight corridors may be either rail or highway, but should recognize the value of connecting goods and services.

There are several factors that have a maximum of 5 points possible, such as "Improving Access for Business Development" and "Improving Investment and Employment Opportunities," for which there is no defined criteria for earning partial points. Is it intended that in these cases the score is either 0 or 5? Or is there a way to earn partial points? If partial points are possible, is it a subjective assignment?

The 5 community growth and economic development factors seem like there would be some overlap between the areas. It's almost like the 5 areas are narrowly defined to allocate points but in the real

world, economic development is never a narrow issue. I suggest maybe fewer but broader groups, totaling the same 25 points maximum.

Will the TRAC consider a non-contiguous project. The footprint for economic development would be one with one environmental document, but may sell in phases using logical termini.

There was discussion on a possibility of other green incentives. Air quality is not the only incentive used, brown fields are considered and multi-modal transportation - are there others that can be considered?

Under the Economic Development Criteria consideration should be given to gradual scoring (0 to 5) for Adopting Land Use Measures, Improving Access, and Improving Investment rather than an all or nothing approach (0 or 5).

How will ODOT sponsored projects be scored relative to the various Community Economic Growth and Development Factors when ODOT projects may be more transportation need related and thus may not conform to a local's land use or zoning plan?

It was suggested that language that includes "job retention" be added to the scoring criteria write up. The current write-up only focuses on unemployment and giving points for that.

It may be beneficial to specifically recognize the concept of a "corridor". (Is Ohio a member of the National Corridors Initiative?) Where the words area or city or county appear, in some contexts the phrase "cities/counties/corridor", or simply the word corridor alone, may help emphasize that the project does in fact apply to a transportation corridor of contiguous areas (the corridor should be defined).

In the areas of Community Economic Growth and Development Factors section, I do have several comments. Although the process does discuss "unintended, negative consequences" it does not impact those negatives in the scoring process. Presumably, there could be significant negative consequences to a surrounding street traffic pattern or neighborhood (by increasing the number of cars on a residential/school street or in an Historic District) and still get positive points or at least a "0" score. This places no burden on the applicant to address those negative aspects in the planning process, if they are willing to accept a lower grade or no points in the scoring process.

Can there be negative scoring for projects that do not address unintended negative consequences?

I have a concern about projects that do not plan for the building process in their application; that is, are there ratings (positive or negative) for projects that look at how long a building project will take and how that will positively or negatively impact the development in the neighborhood/area/region. Closing an exit ramp for a year in order to build an enhancement, can devastate businesses or communities and should be evaluated along with the potential benefit to be derived upon completion.

Economic Distress

Units of local government base might be fairer for the cities than by the county when considering economically distressed areas

Felt that Economic Distress and Local Investment could be mutually exclusive in some situations and would often counteract each other. Maybe more weight should be added for economic distress and the points for local match reduced somewhat

The economic distress score is based upon county geographic unit. Would a two county project use an average score? How would a project of regional significance be addressed.

Scale and point structure for the economic distress scoring needs to be reviewed or restructured. There is only one region in the State of Ohio that meets the greater than 30% scoring criteria and thus is not supportive of large urban areas.

To earn points under this criterion, the applicant should have to demonstrate how the project will ameliorate the distress factor. Building a transportation project without a well thought out plan on how it will lead to an improvement in the area's economy, would not be a prudent use of the limited funding available to Ohio. Also, the number of people in poverty or unemployed should be considered rather than just the percent of the population.

Adopting Appropriate Land Use Measures

We support the criteria for linking land use and transportation planning.

I like the idea of giving points for land use planning.

There was discussion that the need for a master zoning plan would be a problem in our (rural) district.

If this category does not include Access Management for the proposed improvement and general area, it needs to be a big part of this component. In fact, the implementation of Access Management should be a factor of its own. Without Access Management, we could be creating future traffic problems that will become future projects that are a future expenditure of precious transportation dollars. With Access Management required, we can build it right the first time.

A project that is part of an existing comprehensive thoroughfare plan should get more points than a project that just "springs to life" for one reason or the other.

LCATS supports the value of comprehensive planning, zoning, and the integration between transportation and land use planning. However, the points awarded for land use policies needs to be more clearly defined. The quality and age of comprehensive plans and zoning efforts vary tremendously.

It should be noted that having a comprehensive land use plan and adhering to it in the face of proposed new developments are two different things. Many times ODOT has found that transportation projects reach their capacity earlier than projected. Often this is because local agencies accept land developments in excess of their comprehensive plans. This is not to say the local agencies don't have valid reasons for approving these developments, only that having a comprehensive plan is no guarantee their will be co-ordination with a proposed project.

In areas covered by an MPO, the state should consider if the MPO's fiscally balanced Transportation Plan includes the proposed facility and well as the network of facilities which may be needed to adequately support it.

TRAC should consider checking for specific elements of a comprehensive plan to ensure it is consistent with transportation investments. The two that come immediately to mind are a thoroughfare plan and an access management plan. The adequacy of these plans should be well within ODOT's ability to assess.

TRAC should require applicants to assess the impacts the project will have on the surrounding area, positive as well as negative. Statements from community and business leaders should be required parts of the application.

Positioning Land for Redevelopment

Redevelopment criteria does create a bias to urban development

Liked encouragement for re-use rather than urban sprawl and greenfield sites

Encouraging redevelopment of brown fields is a laudable objective.

I feel the points are too bunched up in the 50%-100% range. Often, infrastructure and usage is done in phases and waiting until 50% to award points is waiting too long in the life cycle of land development. I suggest 5 points spread out starting at 20-30% instead of 50%.

Scoring should count commercial jobs as well as industrial jobs.

Under "Positioning Land for Redevelopment" the statement "The TRAC recognizes the benefits of (new) land development" appears, yet no points appear available to evince such claimed recognizing. If a totally-new-development land project with many fantastic benefits appears, should it warrant more-than-zero positioning points?

Improving Access for Business Development

Economic Development on previously developed or development-ready sites is an aspect that is viewed positively in the LCATS region. These locations already have several of the elements needed to establish true economic benefit. LCATS supports redevelopment and development ready sites over the expansion of "infrastructure needy" sites.

This is a laudable goal, but the number of employees or payroll and volumes of freight would be more meaningful measures.

Another aspect of this criterion should be the temporary impacts of construction. Some projects are so ill-conceived they destroy the surrounding businesses during construction and it takes years to recover even with improved access provided by the project.

Improving Investment and Employment Opportunities

I think the Improving Investment and Employment Opportunities should be sure to tie increase in land values to employment opportunities and not residential land value increases.

The economic development section awards points for job creation, but does not distinguish between type of jobs retained or created. There is a wide range of economic wealth built by jobs from retail vs. commercial vs. manufacturing, etc.

Is increase of land value a suitable surrogate for increased employment opportunities?

All in all, this criterion represents a worthy objective, but applying it will likely prove troublesome. Ensuring the legitimacy of the sponsor's claim is one reason awarding economic development points in the past has been so difficult. Projects serving a location with a track record of job creation should be credited with higher scores than sites with no history.

Another concern is the type of land use which will be supported by the state's funds. Does the state want to support creation of any job, for example, at a fast food restaurant, or only jobs that result in an increase in employment for the state?

This criterion could facilitate the use of public funds primarily to benefit private land holders. If the public investment will contribute to increasing private value, the benefactor should be required to return some of this value to the project. Part of the Land Use Measures criterion should include development impact fees. The TIF sub-criterion should include the requirement that some of the funding is dedicated to the project.

Local and Private Project Investment Factors

When does "local investment in local infrastructure" expire? In other words, how far back can the investment go?

Raised the issue that local/private investment in projects often support sprawl, the downside of attributing points to this factor.

A concern is that FIX IT FIRST should continue to be a priority for allocation of Highway funding. The necessity for completing unfinished projects should be weighted through the scoring system and may be considered as the proposal is written if adequately addressed in both the return on investment scoring and the congestion area .

The City (of Columbus) opposes the proposed change that will no longer consider earmarks as part of the local investment in a project. Until earmarks are completely eliminated and no longer part of the highway bill, it seems inappropriate and arbitrary for ODOT to no longer recognize them as a local contribution

Congressional earmarks should count toward local match.

Had concerns about the earmark exclusion in determining points for Local Investment. A different process is used to determine FTA earmarks and they are derived before the amounts are allocated to individual states - so those earmarks ARE additional funds to Ohio and should be credited. We told them to make sure they relayed that information to TRAC

If an earmark actually brings in extra money to the state, such as an FTA earmark for a transit project, that earmark should be counted as local match.

"...funds obtained through project-specific congressional designation (commonly known as "earmarks"), will not be considered part of the local investment in the project." He felt the influence used by the

local governments to obtain earmarks through their legislators is a demonstration of local support for the project and should qualify the earmarks as a local share.

Clarify "earmarks" definition. Example is an earmark from a different funding source other than ODOT's normal federal-aid funds allocation. Will this be considered as local investment since it does not affect ODOT's federal-aid funds allocation?

The limitation on allowing federal earmarks to be used as match should be lifted in cases where the earmark is provided in such a way that it does not reduce the donor state equity adjustments that have been included in recent surface transportation legislation. For example, typically transit earmarks do not affect the state's equity bonus.

Regarding local commitment , for existing 'fix it first ' projects , the dollars necessarily committed by ODOT should be considered as local dollars, as those funds would be expended whether the projects are completed or not.

Not being able to count federal earmarks as the local share may be a problem for a lot of future projects.

How will ODOT score local investment for 100% ODOT funded projects? Will it get the maximum points? It would seem to handicap ODOT projects if no local investment points were given.

How will ODOT sponsored projects be scored relative to the Local and Private Project Investment Factors? Will it receive a maximum of 20 points or the minimum of 4 points?

The percentage ranges for "Maximizing Public Investment" went too high, i.e., up to 41% and greater for maximum 20 points. Without the consideration of earmarks as local match, they felt that rural cities and counties would never have the ability to score well in this category because of their limited budgets. They suggested 20% local match as the top requirement.

I think the overall percentage of this factor is too high. Since most LPA's have the same financial problems as ODOT, coming up with enough local money to garner any points would be very unlikely. Under this category, only large retail developments could provide any significant local funding to get points under this category. With this factor at 20%, it's large share of the overall scoring would skew the points to retail development projects over safety upgrades. Take away 10 points from this category, give 5 points to Access Management and bump safety upgrades 5 more points to 10 points.

While there is a willingness and understanding that local jurisdictions must be committed financially to a project, high percentage rate participation may not be financially possible for smaller jurisdictions or large-scale projects. Perhaps a sliding scale based on the project cost and/or population of the community may be more appropriate. Under the current proposal, if you are a poor or small community your chance of receiving funds is slim.

Concerned about Fairfield County's ability and the ability of less populous counties to provide large percentages of costs on major transportation projects. I understand the need to leverage resources but

perhaps some measure of local government financial capacity could be factored in to address this concern.

Raised the issue that a distressed city is less capable of providing the 20% of funds for a project than a more affluent municipality – again a factor that could encourage sprawl. In a previous meeting with the City of Cleveland, the issue was raised that 20 points for local investment seems counter to the Governor’s Fix It First and rebuilding the urban core policies.

The local share for distressed communities needs to be balanced / reduced to score high on investment factors. A multiplier or sliding scale for a distressed community is needed to keep / make us competitive.

The current draft will give non-distressed areas first point advantage over distressed by “buying” points with higher local share.

Can right of way land donations be used as part of the local match percentage?

Since right-of-way costs are such a large component of new projects, then the LPA should get local investment points for in-kind donations of land needed for the right-of-way.

If communities are committed to a project, when do zoning and TIFs go into place? How do you design around zoning?

How will projects with built-in revenue streams be viewed?

Utility infrastructure should be available as part of the project costs and considered as local fund match.

Consider providing funding for smaller areas, limited to those areas to apply for this funding.

General

Exempt (existing urban interstate reconstruction project) from additional TRAC review, and maintain an efficient completion of this project as currently outlined by the current TRAC commitments. Retaining its current TRAC priority ranking and construction timeline will allow the region to honor its commitment (to local projects and investments which were made based on the TRAC commitment).

The offer to assist prospective project sponsors to work with ODOT to gain consensus of key areas such as project scope area will greatly aid the work of the Council and result in better crafted proposals and projects

The general overhaul of the criteria is positive and should clarify and simplify the process.

Reference is made to an article in "Public Works" regarding the potential Metropolitan Innovation Fund (MIF). Suggestion that the goals in the TRAC match those in the MIF. The priorities need to meet federal criteria to take advantage of the bonuses suggested in the MIF.

Big counties will still benefit

How will smaller, rural communities compete?

Rural projects have a disadvantage in competing with urban projects or those labeled as contributing to “sprawl”. This negatively impacts any competitive edge a rural project might have over an urban project.

Expressed an interest in seeing if TRAC funds could be used to buy new buses.

Where are the funds coming from for projects for modes other than highway?

Can a private entity, such as a private rail line, request TRAC funding.

Will the TRAC consider adding points for design deficiencies?

Will TRAC re-evaluate every project with the new criteria?

Will the existing Tier II projects have priority over any new projects?

What is the time line for new applications?

Are Tier 1 projects currently funded for construction? If not, will these be sensitive to the economy?

Will all Tier 2 projects be rescored/reevaluated?

Status of existing Tier 2 projects?

Will the TRAC threshold for projects be \$5 million or will it be increased?

How will old TRAC policies be addressed in this proposed scoring process? Example is the TRAC policy that TRAC would only fund 50% of a new interchange and the locals would have to fund the remaining 50%.

Is there a table for all multi-lane highways that showed the congestion measure (either LOS or V/C ratio) and the accompanying air quality measurements?

Is it possible for local project sponsors to have their applications be pre-screened by ODOT to seek input into their assumptions on “project footprint” in the application so as not to have a major disagreement with the TRAC board when the formal application is submitted? Note, this is not a request for a formal process step but as an option a local project sponsor may want to use when preparing a TRAC application.

Is there a different project footprint for each type of scoring criteria? Such as economic growth factors may be county wide or region wide but the reduction in VMT may be smaller and related more directly to the project’s physical “footprint”.

Is it possible for TRAC to address the conflict in time lines associated with project development and implementation and private investment factors?

Currently, private investment has a much quicker and shorter development time line than TRAC projects, so as to encourage more private investment in a TRAC project, is it possible for the local government agencies finance the project on a faster timeline and then have TRAC review and score their application appropriately and then commit to pay the local government back the determined TRAC share?

The existing TRAC Policy 2 requiring that the appropriate MPO or ODOT's Division of Planning review and recommend a project before it is submitted to TRAC.

Has TRAC beta tested these scoring criteria on the existing TRAC project list and on non-highway mode projects? If so, how did the projects rank and will the new proposed scoring achieve the intended balance between the modes?

How will the state's budget affect projects not fully funded?

What happens with that one project that didn't exist before but really needs to be done?

There needs to be a continued focus on pushing projects through, but yet there should be some flexibility for that one that needs to be done and not identified.

Will the makeup/members of the TRAC change?

Credit should be given if small communities maintain a public transportation system.

A small community that undertakes a major project should be allowed additional points for the effort.

Job creation . . .good --- commercial, industrial should all be counted. Like the points for good planning!
Good meeting!

Extra points should be given when one subdivision joins with another on a major project. (Examples: City-County; City-Township; County-Township)

I also would be in favor of having projects in Tier Two continuing on to Tier One when funding is available without being re-ranked. The Carroll interchange has impacts not only on Carroll and Fairfield County but also southeast Ohio and is essential to the maximizing the benefits of the Lancaster and Nelsonville bypass projects investments.

Is there a way to factor in the number of political entities involved?

Request to add points for macro corridor completion.

Request for a portion of the TRAC funds to only be used for the economically distressed areas.

Suggest a feed-back loop. After project is built, review to see if you got what you expected, if not, modify criteria.

The funding time tables for a TRAC project with local contributions may not mesh; for example, OPWC funds are usually made available for the following year, but TRAC projects take several years to develop.

The MPO's across the state work diligently to identify needed transportation infrastructure improvements in their regions. Their inclusion and work should be formally included in the TRAC selection and review process. Their long-range Transportation Plans identify local priorities and projects selected by TRAC should be approved and consistent with the MPO's plan.

Another issue that involves local participation funds is the variance in timelines of various funding sources. Many of the local match sources are calendar year and have much shorter "turn-around" times than utilizing federal transportation funds. For instance, OPWC funds are awarded annually and are used in the following calendar year; while traditional transportation funds from ODOT are based on state fiscal year and projects take several years to advance through the Project Development Process (PDP).

The Major/New Project Scoring proposal is an improvement in the former process especially in its implicit understanding that transportation is not an end unto itself, but is a means to achieving prosperity and a better quality of life for the state's residents. Another positive facet of the new approach is the attempt to lower the need for new infrastructure investments by encouraging reuse of investments that have already been made.

The qualitative and undefined nature of many of the criteria will make application of the new process more difficult. However, if it is applied in good faith and equitably across Ohio, it should result in projects that better meet the state's needs.

It would be helpful if more detailed procedures for calculating the scoring criteria were provided including display of units for all criteria which are measured or calculated. This would make the system proposed clearer. It would also be helpful to see an application of the process to a small, but varied, sample of existing projects. Knowing how the process works for actual projects may make some comments moot and uncover other aspects of the process that would benefit from additional refinement.

In many criteria only the magnitude of the project is rated and no assessment is made of how much of the problem is corrected. Also, often only a portion of the magnitude of the problem is considered. The number of residents affected is often omitted in lieu of just the portion of residents.

The whole package focuses on the scoring of the project. A check and balance system needs to be in place to prevent certain types of projects from monopolizing the funding. Possibly a percentage of the dollars would be required to go to rural projects as an example

It is understood that the scoring has been tested against current project applications for a "reality check." Provisions should be made to allow for adjustments of the individual scoring scales if real data trends not to use the full range of scores or results in maximum credit too easily

I would like to see the TRAC make a solid commitment to weighting the scoring for transit and rail projects towards that end. The economic development initiative will be driven by the private sector if they see traffic counts that can support their investment.

A concern is that FIX IT FIRST should continue to be a priority for allocation of Highway funding. The necessity for completing unfinished projects should be weighted through the scoring system and may be considered as the proposal is written if adequately addressed in both the return on investment scoring and the congestion area .