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Paul Milde  
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September 21, 2017

The Honorable Aubrey Layne  
Secretary of Transportation  
Commonwealth of Virginia  
1111 East Broad Street  
Richmond, VA 232191

**RE: Concerns of Draft State Recommendation for Application Limits for Smart Scale Round 3**

Dear Secretary Layne:

We are writing to express our concern that the Draft State Recommendation for Smart Scale Round application limits would disproportionately limit the number of applications for localities and MPOs/PDCs compared to transit agencies. Localities and MPOs/PDCs have broader multimodal transportation planning responsibilities than transit agencies, and therefore it does not appear reasonable that transit agencies would have the same number of applications as a locality or MPO/PDC for a given Tier Level. The application limits for localities and MPOs/PDCs also appear a little low. As a result, we request consideration of an alternate application limit approach that would limit the number of applications for Tier 1 localities and MPOs/PDCs at 5 and for Tier 2 at 10, while transit agencies would be limited to 2 at Tier 1 and 4 at Tier 2 as shown below. This alternate application limit approach would reduce the potential maximum number of Smart Scale applications compared to the Draft State Recommendation.

**Draft State Recommendation**

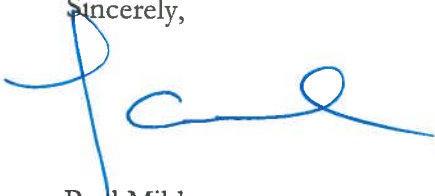
Tier	Localities		MPOs/PDCs		Transit Agencies	
1	< 200K	4	< 500K	4	< 500K	4
2	> 200K	8	> 500K	8	> 500K	8

**FAMPO Input**

Tier	Localities		MPOs/PDCs		Transit Agencies	
1	< 200K	5	< 500K	5	< 500K	2
2	> 200K	10	> 500K	10	> 500K	4

I appreciate your consideration of this request. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Paul Milde  
Chairman

**Cc: FAMPO Policy Committee  
State Legislative Delegation  
CTB Members**