

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Needs based methodology should be deleted because it is too simplistic by not gauging the efficacy of the transportation solution. • Urban loops were included in 1989 to increase support from urban areas. Economic prosperity should not be principal focus. • Travel time savings needs to account for aggregate vehicle hours of reduction. Don't look at just parallel routes. User benefits should be number of benefitees times amount of time saved by each. • User pay financing should receive greater attention. • Use of net loop project costs is appropriate. 	<ul style="list-style-type: none"> •Needs based factor's identify existing deficiencies. A benefit-cost analysis looks at needs, benefits and costs. We agree needs can be a simplistic view, one of the reasons it was chosen – to be more easily understood. Efficacy of the solution is important. The Department will presume that the transportation solution will address all the transportation needs for a 20-year forecast and thus result in a effective and efficient solution. • The law now allows ten urban loops to be funded using urban loop funds. The 1989 law outlined certain goals, i.e. support statewide growth and development , and the Urban Loops were part of that law. There has been no change to the legislative language of the objectives of the program. The Department believes there is a need to adhere to those goals for the Urban Loop Program.. •Good comment. The intent is an approach that will provide aggregate vehicle hours of reduction based on travel time savings in metropolitan area with and without loops. This will be done with the help of the MPO and Regional travel demand models. This will be network based. This involves looking beyond just the parallel routes. User benefits are to be determined by the time saved by each. •NCDOT agrees. NCDOT desires an approach that moves projects more quickly to construction where non-loop funds will supplant loop funds. A new criteria will be added to address this. See “Non-Loop Funding Factor” in the revised criteria. One caveat is that the G.S. 136-66 and GS. 143B-350 place restrictions on giving an advantage to any project using local government participation. Therefore, local contributions can not be used in the non-loop funding factor unless the legislation is amended. •Thank you.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Agree that economic development is good and use of Dept. of Commerce model is good but need to gauge economic impact long-term and not just on the temporary benefits of roadway construction • Environmental study status is given too much weight. • Air Quality conformity given too much weight • Urban Loop projects are high priority in their MPO area 	<ul style="list-style-type: none"> • NCDOT continues to work with the Department of Commerce to refine the economic development model. Predicting job creation is not an exact science. The model will focus on two factors: employment opportunities created by Construction Impacts and the dynamic measure of economic development impacts on existing business. The Department commits to working with MPO staff to allow them to review the inputs before the model is run • Several comments have been received similar to this. Environmental readiness is probably not a benefit but it certainly is a requirement for a project to advance to construction. The Department agrees to delete it a a factor receiving points. It was a relatively low impact in the scoring anyway.. • This criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria. • The Department agrees. Several MPO’s have made the same observation. This is one of the reasons why there is a separate Urban Loop Prioritization process. The SPOT template for overall Strategic Prioritization Process allowed MPO’s to send this same message about loop projects being high priority. Some indicated this, others did not rank Urban loops since they were excluded from receiving points.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Supportive of NCDOT efforts to make process both transparent and data-driven. • Agree with first four principles but does not agree with allowing Sec. NCDOT to adjust rankings. • Mitigation of congestion is not addressed. Reduction of VMT should be a needs factor. Do not emphasize economic development above congestion. • Travel time savings needs to account for aggregate vehicle hours of reduction. Don't look at just parallel routes. User benefits should be number beneficiaries times amount of time saved by each. 	<p>Thank you.</p> <ul style="list-style-type: none"> • This is surprising that the MPO thinks the NCDOT Secretary should not have this flexibility. NCDOT has evaluated this comment and continues to believe the Secretary should have this flexibility but does not expect it to be routinely used. There are too many variables to say that a purely technical data ranking is the sole answer to prioritization. When this principle is used, NCDOT commits to explaining why projects were moved up or down in the rankings. • Congestion is a needs factor which is based on the volume to capacity ratio of existing parallel routes. Mitigation of congestion would be a "benefit" factor. The travel time savings factor essentially incorporates the "mitigation of congestion" issue. Regarding the weights, The Department agrees that economic development should not be emphasized above congestion. • Good comment. The Department is working on an approach that will provide aggregate vehicle hours of reduction based on travel time savings in metropolitan area with and without loops.. This approach will look beyond just the parallel routes. The approach will evaluate the user benefits of the amount of time saved by each user based on a network analysis.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> The only “cost factor” that should be considered are costs utilizing traditional NCDOT funding sources. Toll revenues should not be considered as a cost to NCDOT since it is being borne by the users. Economic Development Impact criteria is weighted too high because job creation is difficult to predict. Also, jobs retained through facility improvement is not addressed. Give consideration to “other factors” like building usable segments, avoiding lapse of planning documents and permits, paying for cash flow projects and particularly for local areas providing funding for loop projects. Agree with DCHC and Regional Transportation Alliance comments. 	<ul style="list-style-type: none"> The only “cost factor” to be used will be expected costs to purchase right of way and construction. A new criteria has been developed to help address this comment. See the new factor titled “Non-Loop Funding Factor”. NCDOT continues to work with the Department of Commerce to refine the economic development model. Predicting job creation is not an exact science. The model will focus on two factors: employment opportunities created by Construction Impacts and the dynamic measure of economic development impacts on existing business. The Department commits to working with MPO staff to allow them to review the inputs before the model is run. In an effort to keep the criteria to a manageable number and simple, the Department has not developed criteria for every possible factor that could impact urban loop prioritization. Given the interest in the comments received regarding local areas providing funding for loop projects, a new criteria titled “Non-Loop Funding” factor has been developed. However, certain General Statutes do impact how this factor will be implemented. See details in the revised criteria. Thank you and so acknowledged. NCDOT responses are given elsewhere to those comments.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Agree with a quantitative methodology approach. • Since details are not fully developed, TAC desires another review after details of how points will be assigned. • Keep methodology flexible by updating it with TIP cycle and give opportunity to comment.. • Agrees with Safety and Congestion scoring but omit Infrastructure Health. Thus, weight safety at 20 percent in lieu of proposed 10 percent. • Clarify how parallel routes will be chosen. • For congestion score, use peak hour volume to capacity ratios not daily volume. • Safety score should be simplified to be based on standard statewide crash rates for facility types and give more points to diverting traffic from urban streets than other freeways.. 	<ul style="list-style-type: none"> • Thank you. • The Department will undertake another round of public comments to allow further comment on proposed criteria. Also, the Department will work with MPO staff to review inputs before the model is run. • Agree. • Agree. Urban loop projects will enhance mobility and enhance safety on parallel routes. The Infrastructure Health factor has been deleted. • The Department will work with each MPO staff to come to agreement on which parallel route(s) will be used. • Agree • Safety score is based on actual critical crash rate, crash severity and crash density rates not statewide rates for different facilities. Data is from parallel routes – which will be agreed upon by MPO and SPOT. Predicting safety reductions in any of these categories by building a loop project would be purely fictional.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Travel time savings needs to be better defined, needs to be based on decrease in vehicle hours traveled from the project for the urban areas network and MPOs should review once again after methodology is further developed. • Economic development needs to go beyond measuring new job created. Needs to include a measurement of existing employment served by the project. Add preservation of existing nearby employment to the economic development measure. • Agree that air quality measure is needed but simplify it. Propose it to be simply 20 points for a project needed to meet AQ conformity and 0 points if it is not needed. 	<ul style="list-style-type: none"> • Agree.. The Department will undertake another round of public comments to allow further comment on proposed criteria. Also, the Department will work with MPO staff to review inputs before the model is run. • NCDOT continues to work with the Department of Commerce to refine the economic development model. Predicting job creation is not an exact science. The model will focus on two factors: employment opportunities created by Construction Impacts and the dynamic measure of economic development impacts on existing business. The Department commits to working with MPO staff to allow them to review the inputs before the model is run • This criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria..

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Agree with truck traffic factor but consider what type of facility from which the truck traffic is diverted, i.e. urban streets or other grade-separated facilities. • Do not use Land use factor as proposed because all areas should have some form of land use plans. Instead, TAC proposes a sliding scale of points from 0 to 5 depending on percent of right-of-way protected and if NCDOT owns the right-of-way, points are doubled. • Consider a new factor: measure is miles of existing or authorized urban loop roadways per urbanized area population. • Consider a new factor: Use a qualitative factor of where MPOs rank loop projects, higher rank, more points. 	<ul style="list-style-type: none"> • This comment is a worthy comment but the traffic models are not sufficiently detailed to further refine this factor. The Department is trying to keep these factors simple to understand and therefore this comment will not be implemented. • Agree. The Department will refine this criteria to provide points where right of way is protected. However, the Department does not intend to double the points where right of way is already owned. This urban loop process is to address those projects where funds have not already been committed. • Disagree. This type of factor is considered more of an “allocation” or “apportionment” factor to be used if urban loop funds were to be distributed to the ten areas. It is not a needs or benefit factor or cost factor. • Disagree. The Department believes that each of the ten urban areas would rank loop projects very high, especially given there is a separate funding category for these projects. Therefore, it would seem that all projects would probably get similar points if the MPO ranked these projects.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Ensure consistent and most current cost data is used in determining the priority ratio. • Objective is a positive step, recognize details yet to be refined, willing to work with NCDOT to finalize. • Multi-modal factor makes no reference to bicycle or pedestrian connectivity. Some Durham projects may include these improvements. Please add this criteria. • Environmental readiness factor should be deleted because it does not measure benefits of the project. Instead, an environmental factor should be included which measures impact of project on natural or community resources i.e. acres of watershed impacted, stream crossings, fragmentation of natural habitat, relocation of homes, urban sprawl. 	<ul style="list-style-type: none"> • Agree and will do. • Thank you and the Department will work with MPOs to further refine these criteria. • Urban loop projects traditionally are freeway type facilities where bicycle and pedestrian use are not encouraged. The Department agrees that urban loop projects should enhance bicycle and pedestrian connectivity where necessary and will commit to address this connectivity where feasible in constructing loops. However, this is not a factor that materially affects scoring or a priority ranking. • Partially Agree. Environmental readiness is probably not a benefit but it certainly is a requirement for a project to advance to construction. The Department agrees to delete it as a factor receiving points. It was a relatively low impact in the scoring anyway. The impact to natural or community resources can not be accurately measured for all remaining urban loop projects since the environmental documents have not yet advanced for all projects. Therefore, this comment will not be implemented.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Rank whole loops AND segments of loops. • Ensure consistent “needs” data is used and verified by MPO before model is run. • Run model to isolate loop’s effects (no other projects) • After ranking, MPO’s should be able to rank segments to be constructed first. • Give special consideration for Ft. Bragg, other strategic military locations, homeland security, national defense and FEMA staging areas. • Hazardous freight should be given special consideration. • SPOT and MPO need to agree on “parallel” routes used to generate needs data. 	<ul style="list-style-type: none"> • Urban Loop funds will only be used for remaining Urban Loop TIP projects yet to be constructed. Only these TIP projects will be analyzed. • Agree. The Department commits to work with MPO staff to review data inputs prior to running the model. • Agree. • Agree that MPOs should be consulted on which segment of an urban loop TIP project will be constructed first. • The Department agrees in concept that the importance of an urban loop to homeland security is a benefit. We will include this in the “other considerations” factors. • Good concept but data does not differentiate between hazardous and non-hazardous cargo. • Agree. The Department commits to work with MPO staff to review data inputs prior to running the model

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Propose segmenting U-2519 and map was attached. • Land Use points should be based on how long land use plan has recognized loops. • Use updated cost estimates for entire loop and subtract funds already expended from total. • Assign benefit factor and associated point system to projects beyond feasibility. • Assign points if project has completed environmental documentation, completed design plans or completed R/W acquisition, shovel ready, etc. 	<ul style="list-style-type: none"> • Thank you. U-2519 will be evaluated as one project to be consistent with other loop projects. Which segment is built first will be done after consulting local officials. • The Department will change this criteria to provide points where “right of way is protected.” The more right of way that is protected, the more points. • Agree to use updated cost estimates using consistent data for all projects. Do not agree to subtract previous funds since we are prioritizing remaining projects to use uncommitted loop funds. • The Department believes there is a need to assign points regardless of whether the project is in a feasibility status or beyond. The projects which best meet the criteria should be considered for earlier funding. • Comment appears to be saying projects further along in project development should receive points. Concept is good. However, the Department still needs to consider that there may be projects that have advanced that do not rank as high as those that have not advanced. This will be included under “other consideration” factors after the rankings are determined. The environmental readiness factor has been deleted.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Concurs with the proposed methodology • Comments on Travel Time Savings: • 1. Consider using reduction in Vehicle hours of delay (VHD) as the measure • 2. Use 2035 E+C as basis as no-build. With improvement is the build scenario. Compare build and no-build reduction in VHD. • 3. Highest performing projects gets 100% and other projects decrease as VHD gets smaller. • 4. Some segments carry higher traffic volumes than other segments when connected with other segments. 	<ul style="list-style-type: none"> • Thank you • Agree • Agree • This could be done if all travel demand models were identical and data inputs completely consistent. There are some differences.. It is preferred to develop the travel time savings and then compare one project’s savings vs. another projects’s savings. The scoring for this factor has been revised to assign points based on which project provides the highest travel time savings in relation to other projects. • This is why it is proposed to evaluate TIP projects rather than segments of loops. Data will be used on each TIP project segment that gives that overall TIP project the highest potential points.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> Consider a supplemental measure of the primary county's economy involved in transportation industries. Use Economic Census data on industry that measures percent of workers employed in the "Transportation and warehousing" sector in each county. Give more multi-modal points where there is more than one multi-modal connection. 	<ul style="list-style-type: none"> The Department will consider this comment in further discussions with the Dept. of Commerce and how their economic model calculates direct, indirect and induced employment effects. Agree. The Department has revised the scoring systems and will give additional points if there is more than one multi-modal connection .

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Change Environmental Readiness Factor to NEPA Process Factor • Give points to projects that if constructed will prevent an areas from becoming non-attainment. • More details on “needs” data is desired. How are these scored? • Regarding multi-modal, is there a way to support Park-N-Ride concept where mass transit uses loop from a Park-N-Ride lot? • Under “Needs Factors”, replace “likely be high score” with “ be a typical high score”. 	<ul style="list-style-type: none"> • This factor has been deleted. • The Air Quality conformity criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria.. • Scoring is similar to overall strategic prioritization process. Data is from same databases. • All loops probably will have mass transit use from PARK-N-RIDE lots. This would then be a “wash” for all the loops. There is no change to this criteria. • Agree. The scoring system has been revised to a more simple system.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • The Wilmington By-Pass project already has a Record of Decision. Please don't allow the document to lapse. • Projects should be approved by the BOT and where ROW has already been acquired, this should be a consideration. ROW has already been acquired for sections A and B. • Another consideration should be when non-loop dollars are being used on loops. Wilmington used Garvee, traditional let and stimulus dollars on Section A. Because of this, Wilmington By-Pass should not be in the Urban Loop Prioritization Process. 	<ul style="list-style-type: none"> • The Department agrees that environmental documents and permits should not be allowed to lapse and will make a concerted effort to ensure this does not happen. • The Department has revised the land use factor to now address right of way being protected. Where ROW has been fully authorized and/or acquired, additional points will be given to those projects since all that is needed is construction. • Partially agree. NCDOT desires an approach that moves projects more quickly to construction where non-loop funds will supplant loop funds. A new criteria will be added to address this. See "Non-Loop Funding Factor". One caveat is that a local government contribution will not be counted in this factor since G.S. 136-66 and GS. 143B-350 place restrictions on giving an advantage to any project using local government participation. Also, all remaining loop projects (those not yet authorized for construction) will be evaluated under the Urban Loop Prioritization Process. The Department will, however, include the Wilmington By-Pass as part of the Urban Loop Prioritization process.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Wilmington By-Pass has been the No. 1 project for years and has been right behind the Fayetteville Outer Loop in the loop schedule. Do not shuffle existing and fully funded ROW projects now. • Air quality Factor- It appears that no consideration/points are given for loop projects in attainment areas • Multi-modal factor: since bike/ped facilities are not allowed, there should not be any additional points for bike/ped accommodation. 	<ul style="list-style-type: none"> • This comment is so noted.. • This criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria • Agree

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Provide a score/points for innovative funding options rather than this being considered as “other considerations”. • Encourages NCDOT to consider the local land use regulations and ability of community to preserve a future transportation corridor. • Ensure that construction costs reflect that some projects are in environmentally sensitive areas. 	<ul style="list-style-type: none"> • A new criteria has been developed titled “Non-Loop Funding Factor”. NCDOT desires an approach that moves projects more quickly to construction where non-loop funds will supplant loop funds. One caveat is that a local government contribution will not be counted in this factor since G.S. 136-66 and GS. 143B-350 place restrictions on giving an advantage to any project. • The Department has revised the land use factor to now address right of way being protected. Where ROW has been fully authorized and/or acquired, additional points will be given to those projects since all that is needed is construction. • The Department will use cost estimating procedures that are consistent with normal Department practices. These procedures indirectly do account for these types of factors.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Process looks really good. • Make sure crash data and congestion data for US 52 is fully communicated. • Should be consideration for historic preservation benefits which would include the damage done to towns by the existing heavy truck traffic. • The "Benefits" factors, do not express enough credit for loop completion for regional through service, particularly trucks. • Commend NCDOT for working towards transparency, accountability and objective criteria. 	<ul style="list-style-type: none"> • Thank you • Agree. The Department will consider using US 52 crash and congestion data in evaluating W-S Outer Loop. • Agree. This is why there is a freight factor. The sooner truck traffic can be taken out of existing towns, central business districts, etc., the more benefits to the town and CBD regarding safety, pavement preservation and congestion. This is built into the freight factor. • The Department has revised the scoring system. See revised criteria. • Thank you.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Ensure the original commitments, priorities and loop projects from the 1989 law will be completed first before additional projects are advanced. • Environmental factor is more a “how” factor rather than a “needs” factor. This factor should reflect need for permitting agencies to establish the permitting priorities. • If a county is a proactive partner in funding for congestion relief, this should be included in multi-modal factor. • Travel time may be too heavily weighted and economic development benefits should receive equal or greater scoring 	<ul style="list-style-type: none"> • NCDOT will follow the law as it exists today. Existing law does not specify which loop projects should be completed first. The needs are greater than the revenues so this is a prime reason for prioritization. • The Environmental Readiness Factor has been deleted. • Good comment but there is also a state law which essentially says that when local governments contribute to a project, the implementation of that project can not affect the implementation of any other project in the STIP. A new criteria is being proposed titled “Non-Loop Funding Factor” and is described elsewhere in these comments. • Good comment. After review, the Department has decided that congestion should receive more weight than economic development in the overall scoring and the revised scoring system reflects this concept.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Step in the right direction. • Objectives are good but include improved safety. Also, safety factor should be higher than 10%. • Apply Needs factors to network and not just parallel routes. • Add more on crash reduction to Benefit factors. • Will un-constructed projects of existing loops have to compete with smaller segment of partially constructed loops and can they realistically do so? 	<ul style="list-style-type: none"> • Thank you. • Thank you. A revised scoring system is being proposed which we believe accurately reflects how Congestion, Safety and Infrastructure Health needs are addressed. • Agree. NCDOT will use travel models on a network basis and not look at benefits based solely on parallel routes. • Thank you and see revised scoring system. • Yes. All remaining un-constructed TIP projects will have to compete against each other. This is part of the challenge of initiating a prioritization process in an on-going program.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Loops in original legislation should be given special consideration. • Multi-modal points should only be awarded if multi-modal facilities are within right-of-way. Also there is an inconsistency in document about ½ or 1-mile for an multi-modal connection. • Before final adoption, a trial run is needed, results shared and analyzed so all can agree it reflects reality. 	<ul style="list-style-type: none"> • Thank you for the comment. The Department must adhere to the current law and will treat all remaining loop projects without special consideration to when the loop project was added to the legislation. • Agree with both comments. The Department will clarify that the distance is to be one mile. • The Department agrees that the final criteria needs to be shared, the data inputs need to be shared and intends to do this before running the data through the model.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Congestion needs factor should be based solely on V/C ratio and not use AADT • Safety needs factor should be 25% and not 10% • Benefits factors should include a factor for how long a project has been in the law but not completed. Environmental readiness factor weight is too low to recognize this. • Air Quality conformity factor is too confusing and asks why projects in non-attainment areas get points over projects not in non-attainment • Benefits factor for Freight should only count through trucks not just measured truck volumes. 	<ul style="list-style-type: none"> • Thank you. The AADT is only 40% of this factor. • Thank you. The scoring system has been revised to more accurately reflect comments received and the Department's position on the scoring of the criteria. • The Department will prioritize all remaining loop projects, regardless of the length of time they have been in the law. Also, the Environmental Readiness Factor has been deleted. • This criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria. • Existing counting methods and data do not now separately list through truck traffic so this factor will remain unchanged.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • No mention of scoring for human and natural environment • Allowing Secretary to adjust final rankings reduces objectivity and re-introduces political influence • Does process consider that many of the projects are only partial loops and not complete loops? • How does infrastructure health score of parallel routes impact priority of loop projects? • What is quantitative approach and data used for “Congestion score”? • Air quality factor should be reworded and points awarded to projects that benefit air quality rather than whether a region must meet conformity determination. 	<ul style="list-style-type: none"> • Human and environmental effects are not known today for all remaining loop projects, therefore we do not have the data to analyze all remaining projects. • No data-driven methodology will result in the perfect ranking system. The Secretary must have the ability and discretion to move projects in the ranking. This is expected to be done on an exception basis not a routine basis and when it is done, the Department will provide reasons for the change in the rankings. • Remaining TIP projects will be analyzed. This means any TIP urban loop project that has not gone to construction. • The Infrastructure Health factor has been deleted. • Congestion is a combination of volume to capacity ratio and AADT. • This criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • For freight factor, where is the data coming from. HPMS does not seem relevant. • Will additional funding sources be considered (tolls, GARVEE, GAP, TIFIA, etc.)? • In travel time savings, has induced travel been considered • Has the transportation/land use point been considered? • Has adequate time been provided to MPO TACs to allow adequate consideration of the proposed process? • A similar prioritization process for Interstate highways would be beneficial and would help with rural political support for loop process and funding. 	<ul style="list-style-type: none"> • The data will be derived from the travel demand models used in each urban area. • Yes. A new criteria will be added to address this. See “Non-Loop Funding Factor”. One caveat is that a local government contribution will not be counted in this factor since G.S. 136-66 and GS. 143B-350 place restrictions on giving an advantage to any project using local government participation. • Yes • This criteria has been revised to give points based on percent of right of way protected in the corridor. See revised criteria for additional narrative. • Yes. However, the Department will provide another round of public comments and commit to work with MPO staff to review and agree on data inputs prior to running the model. • The Department is in the midst of a highway prioritization process for all highway projects across the State. That process is separate from the Urban Loop Prioritization Process.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Applaud the Department’s efforts at creatign a quantitative process • Confirm whether the total benefits factor points are 100 or 150. • Clarify the method of selecting alternative routes to calculate safety and congestion benefits • Eliminate infrastructure health on parallel routes to avoid creating a disincentive to maintain those routes. • In lieu of infrastructure health score, create a factor of completed mileage per urbanized area population • Clarify how travel time savings will be calculated. 	<ul style="list-style-type: none"> • Thank you. • The scoring system has been revised to hopefully make an easier understanding of the factors and weights of each factor. • The Department and the MPOs will work together to determine the parallel routes that currently carry the traffic that will use the urban loop project once the urban loop is open to traffic. • Agree. The Infrastructure Health Score has been deleted.. • This is more of an “allocation” or “apportionment” factor if it were to be used and is not considered a needs or benefits factor. Also, the Infrastructure Health score has been deleted. • The urban areas traffic demand models will be used to assess travel time with and without the loop projects. Travel time savings will be based on the network savings not on just the parallel routes.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Clarify economic development criteria and give consideration to job preservation or retention not just job attraction. • For land use factor, give consideration to whether right of way has been acquired or reserved instead of whether the loop is included in existing plans. • For freight factor, consider types of routes (freeway, arterial or urban) being relieved not just amount of truck traffic. • Consider amount of time saved to get to transportation terminal and not just distance. • Simplify air quality factor to be a simple yes/no . 	<ul style="list-style-type: none"> • The Department continues to work with the Department of Commerce to refine the economic development model. Predicting job creation or retention is not an exact science. The model will focus on two factors: employment opportunities created by Construction Impacts and the dynamic measure of economic development impacts on existing business. The Department commits to working with MPO staff to allow them to review the inputs before the model is run. • Agree. The Department will change this criteria to provide points where “right of way is protected.” The more right of way that is protected, the more points. • The traffic demand models may not provide sufficiently detailed data to make this analysis. One of the principles of the process is that the criteria is to be transparent so the Department is trying to make this simple and understandable. • The distance was chosen to be a more simple criteria to measure. • This criteria will be deleted. A review of the urban loop projects indicate that every loop project in a non-attainment area is part of an air quality conformity determination. Also, loop projects in attainment areas would not have received points and thus may have been at a disadvantage. Comments on the latter were received and consideration was given to assigning full points to those projects. However, all projects then would receive maximum points so it has been decided to delete this criteria.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Use updated and congruent cost information • Desire second opportunity to comment once final draft is created. • Change environmental status factor to environmental factor and impacts to wetlands, stream crossings, etc.. 	<ul style="list-style-type: none"> • Agree. The Department will use consistent cost information for all projects. • Agree. The Department is publishing the final criteria for additional comments. The Department agrees to work with MPO staff on the data inputs before the model is run. . • The environmental readiness factor has been eliminated.

COMMENTS	RESPONSES
<ul style="list-style-type: none"> • Loop program is significantly under-funded and prioritization method is window dressing. • Unless revenue stream is increased or project list is cut the proposed urban loops can not be completed. 	<ul style="list-style-type: none"> • Agree that the loop program is significantly under-funded. Revenue deficit makes a prioritization process all the more important for wise decision-making for loops and all other transportation needs. Not only are loops under-funded but so is overall transportation program. • Wise decisions must be made to expend limited resources. A data-driven prioritization process will help ensure limited resources will be used in an efficient manner and help alleviate concern whether subjective judgments are being made on where to construct projects.