

Dear Mr. Merrill and Mr. Laird,

Thank you again for taking the time to visit Harrisonburg to see the projects we submitted for funding in SMART SCALE Round 5. I am writing in reference to the question you posed on that visit: What would we do to make Smart Scale better? I have outlined a few suggestions for your consideration, below.

We heard Secretary Sheppard announce at the March Commonwealth Transportation Board (CTB) meeting that 25% of SMART SCALE funds were allocated to bicycle and pedestrian projects in the staff funding scenario. We don't disagree that the funding formula favors such projects, and we would support a change in the scoring methodology that separates project types such that motorized and non-motorized improvements do not compete. We would, however, be concerned with seeing these types of projects go away. While I want this letter to be solution focused, I would be remiss if I didn't summarize the reasons we apply for bicycle and pedestrian projects, outside of the fact that their relatively low cost allows them to score well, as an understanding of the "why" helps to explain some of my recommendations for improving SMART SCALE.

First, SMART SCALE is intended to address VTRANS needs. VTRANS accurately identifies pedestrian, bicycle, and transit needs for Urban Development Areas (UDA), pursuant to § 15.2-2223.1, which establishes a specific set of criteria for UDAs, including for density. Localities whose growth occurred post-World War II, after the car took over as the primary mode of transportation, like Harrisonburg, have very little sidewalk throughout the city, with the exception of the historic downtown area. Harrisonburg has built out at suburban density over the decades, and now much of the development is infill, redevelopment, and medium to high density housing at the perimeter. An exclusively motorized transportation system is not functional for an increasingly dense community. Adding alternative mode facilities in urbanizing areas is an example of "coordinating land use and transportation," a precept of the transportation and planning professions.

I understand the CTB's skepticism of the idea that bicycle and pedestrian infrastructure can contribute to reducing congestion. However, please hold space for localities like Harrisonburg whose main source of traffic congestion, and the region's largest employer, is James Madison University. The majority of trips made to campus by JMU's 20,000 students are short distance. Such trips should be made on foot, bicycle, or transit, preserving capacity for employees that come from farther away. Perhaps these short distance trips would be made by alternative modes, if Harrisonburg had a more complete and comfortable bicycle and pedestrian network. This is part of the reason we

seek funds for such projects. They are much less expensive than road capacity projects that would be an alternative for getting the students to campus. Another reason is that sidewalks and bike facilities serve the part of our population identified in the United States Census as zero-car households, as well as the many one-car households that are not simply one person living alone. I don't know what other localities look like with regard to these statistics, but in Harrisonburg, it is big enough to create alternative transportation needs. Note that the concentrations of these households are not in student housing areas. Such facilities are vital to a functional transit network, and the dignity of those that use it. Owning a car is an increasingly high bar of entry for basic mobility, and I have to question the fairness of perpetuating it, when I serve a city council whose motto is "a city for all." Most localities that request funds for bicycle and pedestrian infrastructure are somewhere on the arcs of urbanization and median income, making the relative need for such facilities unique to each community.

I would also like to address the perception of any particular sidewalk's purpose being for transportation versus exercise/recreation. While this is a reasonable criticism, it is difficult to truly separate the two, because they are frequently both at the same time, while also either one or the other at different times, for different people. Active transportation facilities are truly multiple things at the same time – mobility, recreation, physical and mental health, an equalizer of access and therefore, opportunity. Consider the purpose of the PATHS (Prioritizing Active Transportation, Health, and Safety) partnership between the Virginia Departments of Transportation and Health. This program is an acknowledgement that public health has suffered since sidewalks stopped being constructed with development. It is also a demonstration of the Safe Systems approach VDOT and localities are trying to build into our transportation infrastructure.

I have several suggestions to offer on how to reduce the amount of dollars localities seek for pedestrian and bicycle facilities, and how the requests could be further prioritized, in addition to other thoughts on how SMART SCALE scoring could be made fairer.

1. High Priority Program allocation rules. Address the second step of SMART SCALE allocation, which distributes High Priority Program funds. As it exists today, the allocation of High Priority Program funds to districts is limited by the size of the district grant amount. This results in high scoring projects being left unfunded, and quite low scoring projects being funded. A solution to consider would be to complete Step II, as it is currently done, and then establish a minimum SMART SCALE score below which transportation funds shouldn't be allocated, as such low scoring projects indicate little benefit compared to the cost, and Step III is intended to capture projects with high benefit that would otherwise be excluded because of their high cost. Alternatively, a minimum score could be established over which all

projects, statewide, would be funded in Step II, before funds are allocated to low scoring projects in the districts. The minimum SMART SCALE score could be determined in a variety of ways to ensure the equitable distribution of funds.

2. Temporary safety treatments. Temporary treatments, such as delineator post or temporary curbing can be installed to keep crashes from rising, which reduces the number of crashes accumulating in 6-year period, making it less competitive in SMART SCALE. There should be consideration in the safety measure for when a locality installs a temporary measure, such as delineator posts, to prevent crashes. There is a risk that localities might start putting delineator posts out where they are not needed, however, I don't see this as being an attractive strategy, since they have to be replaced often, since they are hit often, and they are aesthetically unattractive. They are not something any community wants proliferating on its streets any more than absolutely necessary. They should really be installed in many more places, and be counted as an indicator of needs, in combination with crash history. I don't believe temporary safety treatments should become permanent, since a maintenance burden, and decidedly unattractive.

The remainder of my suggestions are focused on pedestrian and bicycle facility funding issues.

3. Project categories. Consider establishing separate categories of funding for vehicular projects and bicycle and pedestrian projects, or simply move some of the SMART SCALE funds to the Transportation Alternatives (TA) Program. As you know, the TA Program is not sufficiently capitalized to fund alternative mode projects, due to the cost of most projects. It is only good for one-block-at-time projects, and low hanging fruit, which has largely been completed in localities that have real alternative mode needs, leaving only larger, more difficult projects; the ones that have been continually deferred because of cost. While I spend much of this letter describing the need for alternative mode projects, Harrisonburg certainly has its share of motorized transportation needs, also. Separate categories for motorized and non-motorized projects would help us align our needs to the funding sources.
4. Bicycle and pedestrian needs and real estate development. As mentioned before, localities that have experienced urbanization during and after the post-World War II era, when sidewalks ceased to be constructed with most new development, have bicycle and pedestrian needs that locality tax dollars cannot keep pace with; particularly localities who have proportionally large non-taxable land areas. This is the root of why there are so many requests to SMART SCALE for alternative mode projects. As you may be aware, state statute §15.2-2242. "Optional provisions of a subdivision ordinance" authorizes localities to be able to require the construction of sidewalks by developers in only very limited circumstances, leading to the inability to develop a pedestrian network. The City of Harrisonburg will work with our legislators in the coming months to discuss possible changes to §15.2-2242. I have attached the code section with proposed changes that would make a difference in getting new development to construct pedestrian and bicycle infrastructure. There

- will of course be circumstances that arise for which the amended policy is a misfit, and those can be address in local subdivision ordinances, as exceptions. We all want to keep the cost of development from rising, particularly given the housing affordability crisis. However, related to the cost of sidewalks in development, transportation funding is being pursued to pick up the tab when developers don't pay for them, and safety, mobility, and access are the costs when no one picks up the tab. If the CTB would like to help reduce the non-motorized infrastructure deficit, as communities continue to develop, we would appreciate any support you and VDOT could lend with the legislative change at the General Assembly.
5. Land use factor. I don't know all of the details of how the Land Use score works, but I believe it is intended to prioritize projects in higher density places, and areas with higher population projections. While it is absolutely good planning to consider future growth, SMART SCALE does not consider future growth for vehicular needs, owing to the fact that there simply isn't enough money to address deferred and current needs, let alone future needs. This discrepancy may contribute to alternative mode projects receiving higher land use scores than vehicular projects, but that would be for OIPI staff to verify.

I support transportation funds being used to retrofit old development with pedestrian and bicycle facilities, as needed. However, I believe localities should have the responsibility to help develop the alternative mode network in new development, if the state authorizes us to by amending §15.2-2242. If the legislation is amended, as proposed in the attached, the CTB could then incentivize localities to adopt subdivision ordinances that require alternative mode facilities with development in the SMART SCALE application process by amending the criteria for bicycle and pedestrian facility applications. If a locality has such an ordinance is in place, a SMART SCALE-funded sidewalk/path retrofit project would be much more valuable than if the funds were used for the same project in a locality that does not have such an ordinance, because future development only creates more retrofitting needs.

The existence of a local sidewalk ordinance could be a screening question for determining if an application's land use score should include future population projections, or not. It could also be made a pre-application screening question for a pedestrian and bicycle facilities category, to strictly exclude applications from localities that have not committed to requiring pedestrian and bicycle improvements by developers, in growth areas, after the amendment of the authorizing legislation, as described in item 4.

6. Prioritization. The existing SMART SCALE scoring formula already has ways of prioritizing projects. If this hasn't proven sufficient to exclude non-motorized facilities that don't appear to be priorities, below are a few other indicators that could be considered for prioritizing them.

- a. Density (land use).
 - i. Is the project located in a UDA, which by definition is supposed to include bicycle and pedestrian accommodations?
 - ii. What activity density necessitates alternative mode facilities, such that short distance trips can be made without a vehicle, leaving capacity for longer distance trips? Activity density is defined and described in Appendix E of the Department of Rail and Public Transportation's Multimodal Design Guidelines.
 - b. Street function (safety, land use).
 - i. Has the functional classification of the street changed, creating the need for different design features, amenities, mode choices, etc.?
 - ii. Has the locality identified a modal emphasis for the street in local design guidelines or other local code?
 - c. Equity – what is the median income and median pay in the watershed of the project? This is an indicator of the relative proportion of the workforce that may be walking/biking/using transit to access their places of employment. Median pay must be considered to capture destinations, in addition to median income, which captures origins.
7. CTB policy. The CTB's Bicycle and Pedestrian Facilities Policy for Integrating Bicycles and Pedestrian Accommodations, adopted in 2004, continues to be relevant for the City of Harrisonburg. We would not want SMART SCALE application scores to suffer for including the cost of bicycle and pedestrian infrastructure in project concepts that are primarily geared toward a traffic improvement.
 8. Share the cost. Develop a coalition with other public and private/non-profit agencies for active transportation. There are multiple public and private organizations whose missions involve getting people to work, public health, improving access to school resources/extracurriculars, businesses, recreation, and nature. Some of these organizations distribute grant funds for the same or similar projects as the Transportation Alternatives Program. However, each of these funding sources suffer the same problem as the TA Program, but worse, in that the small amounts of money available result in only a few small projects per year. There are many philanthropic organizations that seek to fund these projects, also, but the dollar amounts aren't there to support the average cost of a project.

As described above, active transportation modes are multiple things at once. To me, this means that transportation dollars shouldn't have to bear as much of the cost for these facilities as it does. But, like the CTB, the other agency's primary interests are not active transportation per se, and like the CTB, there are always more primary needs than there is funding. This creates an orphan of bike/walk infrastructure for which localities are constantly competing with primary interests for funding. Could the CTB use its influence and connections to organize a partnership between Secretaries/agencies that

share the same primary interests of getting people to work, public health, access to school resources, recreation, and nature, such that the cost of active transportation facilities is more distributed across public interests?

Again, thank you for the time you put into the Commonwealth Transportation Board, and the opportunity to suggest improvements to the SMART SCALE process. Please be in touch should you have any questions. Sincerely,

Thomas Hartman, PE, PMP, LEED AP
Director of Public Works