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George Washington Regional Commission
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June 26, 2023
First Class Mail and E-mail

Office of the Secretary of Transportation
The Honorable W. Sheppard Miller III
PO Box 1475
Richmond, VA 23218

RE: SMART SCALE Process Review

Dear Secretary Miller:

Please pass on appreciation from both the Fredericksburg Area Metropolitan Planning Organization (FAMPO) and the George Washington Regional Commission (GWRC) to the Commonwealth Transportation Board (CTB) for their hard work to oversee and steer the SMART SCALE application, scoring, and award process. Our sincere thanks are also extended to the VDOT Fredericksburg District staff who provide technical assistance and expertise with the application process. Both FAMPO and GWRC have serious concerns regarding the staff recommended reduction in the number of applications that will be permitted in Round 6.

VDOT staff is recommending that localities with populations under 200,000 and MPO's, PDC's, and TPO's under 500,000 be reduced from the current 5 pre-applications to 4 (Option 1); and even fewer with Option 2 with only 3 pre-applications allowed. Maximum full applications are proposed to be reduced from 4 to 3 with Option 1; and even fewer with Option 2 with only 2 full applications allowed.

We are expected to submit our Round 6 SMART SCALE project ideas to VDOT in mid-September, and the CTB is going to make their final decision on the number of applications in October. Much work will be done using the current allowable number of applications to make this deadline. This late change will add to MPO's difficulty in preparing applications for Round 6.

We are in full support of dedicating additional funding to increase VDOT staff resources to support SMART SCALE application preparation and to assist localities, MPO's, PDC's, and TPO's who work diligently to gather data and follow the rules, dates, and protocols over each two-year cycle. With Fredericksburg VDOT District staff's assistance, we are proud of our track record:

SMART SCALE Round 1:

- Commonwealth Drive Commuter Lot
- Commuter Lot Expansion East of Exit 140
- Southbound Rappahannock River Crossing

SMART SCALE Round 2:

- Improvements at Brooke and Leeland VRE Stations
- Twin Lake / Kensington Bicycle and Pedestrian Connector

SMART SCALE Round 3:

- Rt 3 STARS Study Improvements

SMART SCALE Round 4:

- I-95 Exit 126 STARS Study Improvements
- Lafayette Boulevard Multimodal Improvements
- Rt 2 & 17 Widening from City Line to Shannon Airport Area
- Rte 1/208 Area Multimodal and Revitalization Improvements

SMART SCALE Round 5:

- US 1-Layhill Roadway and Pedestrian Improvements
- American Legion Road / Eskimo Hill Road Turn Lanes to US Route 1
- Dixon Street (US 17 Business) near Dixon Park Roadway & Multimodal Improvements
- US Route 1 Bicycle and Pedestrian Facilities from Harrison Road to Kings Mill Drive
- Virginia Central Railway (VCR) Trail Regional Project – Multimodal Improvements

In January, FAMPO staff provided the Recommended Projects for the region to the Policy Committee and George Washington Regional Commission:

Recommended Projects				
Application ID	Project	Organization	SMART SCALE	SMART SCALE
			Request	Score
9350	Rt 17-Woods Cross Rd-Davenport Rd Roadway Improvements (RCUT)	Middle Peninsula PDC	\$4,037,924	32.08
9418	Rt 33 / Rt 878 Centerville Rd Roadway Improvements RCUT	King & Queen County	\$3,536,148	12.73
9417	Rt 33/Rt 605 (York River Rd) EB RTL Conflict Warning System	King & Queen County	\$2,474,138	11.14
9478	Express Commuter Transit Service to Dahlgren	Fredericksburg City	\$4,108,075	10.11
9433	Dixon Park Connector - Multimodal Improvements	Fredericksburg City	\$9,337,200	8.56
9077	US1/Hood Drive Rd (Rte 636) Roadway and Ped Improvements	Spotsylvania County	\$12,862,010	7.86
9444	Rte 17 - Main St Intersection Modifications	Gloucester County	\$2,704,253	7.63
9030	US 1-Layhill Road Roadway and Ped Improvements	George Washington RC	\$8,984,521	6.47
9022	VCR Regional Project - Multimodal Improvements	Fredericksburg Area MPO	\$18,588,881	5.75
9308	King William-Rt 360-Rt 611(Venter Rd-Walnut) Roadway Improv.	King William County	\$4,115,656	5.40
9075	US 1 and I-95 (NB and SB) Improvements at Exit 126	Spotsylvania County	\$8,161,308	5.36
9477	Rte 3(Twiggs Ferry Rd)-Rt 630(Stamps Bay Rd) (Roundabout)	Middlesex County	\$8,785,897	5.02
9491	Rte 3 - Rte 198 Roadway Improvements (Roundabout)	Mathews County	\$7,616,872	4.53
9374	Rte 1SB Widening with Pedestrian Accommodations	Spotsylvania County	\$8,929,669	4.46
9414	Rte 360/Rte 647 (Mab Rd) Roadway Improvements	King William County	\$1,929,468	4.38
9494	Rte 615-Rte 605 Roadway Improvements	Lancaster County	\$3,221,566	4.28
9032	Dixon St(US 17 Bus) near Dixon Park Roadway & Multimodal Imp	George Washington RC	\$8,434,208	4.10
9026	US 1 Bike & Ped Facilities from Harrison Rd to Kings Mill Dr	Fredericksburg Area MPO	\$14,187,435	4.04
9493	Rte 3-Rte 1036 (Harris Rd) Roadway Improvements (Turn Lanes)	Lancaster County	\$3,040,355	3.98
9449	Lafayette Blvd - Rte 3 Roadway Improvements	Fredericksburg City	\$7,725,756	3.75
9029	American Legion Rd/Eskimo Hill Rd Turn Lanes to Rte 1	George Washington RC	\$4,969,554	3.45
9074	US 2/17 Benchmark Road Intersection Improvements	Spotsylvania County	\$10,658,974	3.12
9474	Rte 3-Regent Road Roadway Improvements (Turn Lanes)	Middlesex County	\$4,287,877	3.06
6881	SR-610 Widening SR-648 to SR-751 & Multimodal Improvements	Stafford County	\$39,888,388	2.84
Total Staff Recommended - 24			Total	\$161,823,879

We were advised that two of the above were unfunded (Express Commuter Transit Service to Dahlgren and SR-610 Widening SR-648 to SR-751 & Multimodal Improvements); and two additional projects will be funded (US 301 Port Conway-Salem Church Roadway Improvements RCUT and Leeland Road Widening with Multimodal Improvements). Using the proposed reduction in applications, Option 1 would reduce the above 24 projects to only 12; and Option 2 would reduce the above to only 6.

The FAMPO Technical Advisory Committee have these specific comments on the presentation given to the CTB at their May 23rd Workshop, agenda item 8, SMART SCALE Program Updates:

- FAMPO and GWRC are challenged with “Big City” congestion since I-95, US 301, US Route 1, US Route 17, Primary Route 3, and Primary Route 208 all converge through a low tier MPO and PDC. We allocate our CMAQ, STBG, HIP, and CRP funds to these high-volume routes at the sacrifice of our Secondary Roads and high-volume arterials in the Secondary program. The intent of House Bill 2 (Chapter 726, 2014) was to empower eligible entities with the mission and charge to control funding decisions, and a scoring system should not impede the intent of lawmakers.

- The slide that is titled “Potential Solutions Identified – Application Quality; Reduce application cap limits to 2 and 5 using Round 5 data” states “...The overall success rate rose from 39% to 53%...” This is disingenuous in that in the scenario modelled in the presentation, VDOT staff decided what applications would have been submitted with the reduced maximum. We presume VDOT staff selected the highest scoring projects to achieve the 53% success rate. In reality we feel that this will not occur. We believe that MPO’s etc. will have to predict beforehand which will be their top scoring projects. If wrong, the funding will go to other jurisdictions, sometimes in the same district, sometimes elsewhere in the Commonwealth. Therefore, reducing the maximum allowable applications does not improve application quality.
- The Round 5 projects had a 39% success rate which indicates very good Application Quality.
- Localities, MPO’s, PDC’s, and TPO’s choose their applications based on local elected officials’ intimate knowledge of their transportation project needs and it is essential that entities be able to promulgate applications based on constituent demands and expectations. If the number of applications is reduced by any amount, projects that rise from VDOT Pipeline studies will be in competition with locally supported projects.
- There are strict rules about bundling Pipeline projects for SMART SCALE applications. **We believe it will take generations** for them to be completed, if at all, if the maximum application number is reduced.
- It seems counterintuitive to reduce the allowable number of project applications when total funding has significantly increased.

In our letter to you dated February 28, 2022, we proposed a third tier for medium sized entities:

Tier	Localities	MPOs/PDCs/Transit Agencies	Max # of Pre-Applications	Max # of Applications
1	Less than 100,000	Less than 250,000	5	4
2	100,000 to 200,000	250,000 to 500,000	8	7
3	Greater than 200,000	Greater than 500,000	12	10

The three-tier proposal improves fairness and equity for entities under pressure from external traffic beyond our control through land use and local ordinances. We are grateful for the hard work of the CTB and VDOT staff, and our intent with this correspondence is to offer solutions to improve conditions for the Commonwealth.

We also appreciate the delivery of VDOT staff’s review and analysis so that we can gather input to provide a coordinated response to you and the CTB. We look forward to continued success together as partners to improve application development and quality, as it benefits everyone.

Sincerely,

Jason Graham
Chair, FAMPO Policy Committee

Cc Via E-mail Only:

- CTB Members (w/ copy enclosure)
- State Delegation (w/ copy enclosure)

