

BRISTOL TENNESSEE / VIRGINIA URBAN AREA
METROPOLITAN PLANNING ORGANIZATION

Abingdon, Virginia ▪ Bristol, Tennessee ▪ Bristol, Virginia ▪ Sullivan County, Tennessee ▪ Washington County, Virginia

August 1, 2023

Brooke Jackson
Program Manager
Office of Intermodal Planning and Investment
1221 E. Broad Street
Richmond, VA 23219

Dear Brooke,

I am writing on behalf of the Bristol Metropolitan Planning Organization and its jurisdictions regarding the staff recommended changes to the SMART SCALE program. As the MPO for a smaller urban area, our agency and our jurisdictions face several challenges in submission of project applications that score favorably in the SMART SCALE program despite being of great significance to our region. After learning about the staff recommended changes to the SMART SCALE program the MPO held an open discussion meeting with members from the City of Bristol, Town of Abingdon, Washington County, and the Mount Rogers Planning District Commission to discuss the recommended changes. As a general summary, the MPO and its jurisdictions are dissatisfied with the proposed changes to the upcoming SMART SCALE cycle.

Feedback to the staff recommended changes can be found below.

- **Reducing the application cap for Tier 1 entities from 4 applications to 2 applications.**
 - The MPO and its jurisdictions are dissatisfied with the recommendation to reduce the number of applications that can be submitted in the upcoming SMART SCALE round 6. Reducing the number of applications that can be submitted by Tier 1 entities by 50% is an excessive reduction and will substantially and negatively impact each jurisdiction. By reducing the number of applications, only the largest projects would be feasible for SMART SCALE, which severely limits the opportunities for smaller transportation projects to be considered and prioritized. If any reductions were to occur, our MPO and jurisdictions would rather see the cap reduced by 1 for Tier 1 entities and an alternative program for smaller-scale projects be established so as to avoid the loss of funding opportunities for these projects.

- **Final applications must be complete prior to submission.**
 - This proposed change will have substantial negative impacts on smaller jurisdictions and MPOs/PDCs that lack the staffing to secure the necessary resolutions and other documentation that is requested of them only after the pre-application is submitted. This constraint will likely put undue pressure on the limited staff which can lead to rushed project applications and as a result, the quality of project proposals could suffer, leading to less well-thought-out and less competitive submissions. Additionally, smaller jurisdictions may end up not being able to submit applications at all.

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- **Tying consensus funding decisions to entity performance in project delivery.**
 - This change is seemingly in response to project delivery delays that have become a national issue in the aftermath of the COVID-19 pandemic and the supply chain disruptions that ensued as a consequence. Our MPO and our jurisdictions believe it would be unfair to penalize agencies for cost overruns and delays that are faced by jurisdictions nationwide and are ultimately out of the hands of the locality, particularly for smaller jurisdictions with less capacity to absorb inflationary impacts on project budgets or to address labor shortages.

- **Using 10-year future growth to determine congestion benefit scores instead of current congestion conditions.**
 - Our MPO and jurisdictions have been judged to score poorly in congestion-related metrics through the SMART SCALE program in several of the previous rounds. Using 10-year projections for our area would only further skew the congestion scoring criteria against small urban areas and jurisdictions and would only favor larger urban areas in the state with more aggressive growth projections.

- **Limiting projects that are eligible to receive funding through the HPP.**
 - Our MPO lacks opportunities to submit projects that would qualify for HPP under the proposed rules. The projects our MPO will submit in the future will include projects that we believe will have impacts on the Corridors of Statewide Significance and our Regional Network that do not fit within the proposed limited categories.

- **Eliminating HPP funding on a district-wide basis.**
 - Our MPO and jurisdictions believe that this proposed change would unfairly pit projects in our small urban area against projects in districts that score much higher in SMART SCALE to the extent that we would be unable to compete at the statewide level. In the last four rounds of SMART SCALE, the highest statewide ranking any of our projects has achieved was 14, with was within the 96th percentile statewide. Most of our submissions rarely exceed the 50th percentile. Because of this, Step 2 of the funding process gives us and our jurisdictions a more balanced group of competitors for funding than what is currently being proposed.

- **Eliminating Land Use as a stand alone score in the scoring criteria in the evaluation of applications.**
 - Elimination of the land use category from SMART SCALE scoring would be detrimental to project submissions from our agency and jurisdictions, as several of our previous project submissions for Round 5 received substantially higher scores in the land use category than any other category (see Commonwealth Ave & Euclid Ave Intersection Improvements – Project ID 9173). It is difficult to demonstrate substantial safety

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improvements for several of our jurisdictions, as collisions are not consistently reported and thus do not factor into the crash history of these projects. Additionally, our agency and jurisdictions are about to engage in concerted planning efforts to develop a multimodal plan that would identify several projects that would be eligible for SMART SCALE. Enacting these changes would preclude many of these future projects from being competitive for funding.

In conclusion, the concerns expressed by the Bristol Metropolitan Planning Organization and its jurisdictions regarding the staff recommended changes to the SMART SCALE program highlight the significant impact these changes could have on smaller urban areas and jurisdictions. The proposed reductions in application caps and the shift towards tying funding decisions to project delivery performance may hinder the ability of smaller jurisdictions to secure funding for vital transportation projects. Additionally, the use of 10-year future growth projections and the limitations on HPP funding eligibility could perpetuate an imbalance in funding opportunities, favoring larger urban areas at the expense of smaller regions. If you have any questions for me please feel free to contact me at tgillenwater@bristoltn.org or 423-989-5517.

Thank you,



Tyler Gillenwater
MPO Coordinator
Bristol Metropolitan Planning Organization