



MOUNT ROGERS PLANNING DISTRICT COMMISSION

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1021 Terrace Drive

Marion, Virginia 24354

Phone 276-783-5103

August 11, 2023

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

Dear Ms. Jackson,

I am writing on behalf of the Mount Rogers Planning District Commission and its localities regarding the staff recommended changes to the SMART SCALE program. By representing a rural area of the Commonwealth, I realize our localities face numerous challenges with project applications that score favorably in the SMART SCALE program. After learning about the staff recommended changes to the SMART SCALE program, Mount Rogers Planning District Commission ("PDC") collaborated with the Bristol Metropolitan Planning Organization to comment on the recommended changes. In general, the PDC is dissatisfied with the proposed changes to the upcoming SMART SCALE cycle.

Comments regarding the staff recommended changes.

- 1. The Commonwealth Transportation Board is considering reducing the application cap for all entities eligible to submit applications. For Tier 1 entities, the application cap would be reduced from 4 applications to 2 applications. For Tier 2 entities, the application cap would be reduced from 10 applications to 5 applications. Do you support the proposed reduction in the application cap?**

The PDC is 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 localities within our 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. All localities within our jurisdiction fall under Tier 1.

- 2. To facilitate application readiness at time of submission, the Commonwealth Transportation Board is considering processes that will require final applications to be complete prior to submission and changing the terminology for the pre-screening conditional review from "conditional screen in" if a pre-application indicates deficiencies in application readiness at the time the pre-application is submitted to "conditional screen out." This would mean that all resolutions, approvals, reports,**

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detailed project schedules, cost estimates, and other required attachments would need to be completed prior to the submission of the final application and could not be added later. Do you support the proposed process changes related to application submissions?

This proposed change would have a negative impact on smaller localities and MPOs/PDCs that lack the staffing to secure the necessary resolutions and other documentation that is requested of them. This constraint will likely put undue pressure on the administration which can lead to less competitive and incomplete submissions. Additionally, smaller jurisdictions may end up not being able to submit applications at all.

- 3. To address project cost overruns and scheduling delays for locally administered projects that have received funding through SMART SCALE, the Commonwealth Transportation Board is considering tying consensus funding decisions to entity performance in project delivery. Do you support the proposed change to tie consensus funding decisions to performance in delivering projects?**

This change is seemingly in response to project delays after the COVID-19 pandemic, and the supply chain disruptions that ensued consequently. The PDC believes it would be unfair to penalize localities for project delays when it is ultimately out of the hands of the local officials. This is particularly true for smaller jurisdictions with less capacity to absorb inflationary impacts on project budgets and labor shortages.

- 4. To better capture the future impacts of project implementation on congestion impacts, the Commonwealth Transportation Board is considering using 10-year future growth to determine congestion benefit scores instead of current congestion conditions. Do you support using the 10-year future growth conditions to determine project congestion benefits?**

Our jurisdiction has scored poorly in congestion-related metrics through the SMART SCALE since the program was first established. Using 10-year projections for rural areas would only further skew the congestion scoring criteria. This change favors larger urban areas with more aggressive growth projections.

- 5. To address concerns that the High Priority Program (HPP) is being used to implement small projects (projects with cost estimates < \$10 million) that don't have meaningful impacts on the improvement of**

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Corridors of Statewide Significance or Regional Networks, the Commonwealth Transportation Board is considering limiting projects that are eligible to receive funding through the HPP to the following types:

**New Capacity Highway
Managed Lanes
New or Improved Interchanges
New or Improved Passenger Rail Stations or Service
Freight Rail Improvements
Fixed Guideway Transit**

Noting that MPOs, PDCs, and transit agencies are only eligible to submit projects through the HPP, do you support limiting the project types that are eligible to receive funding through the HPP to those listed here?

This change would drastically affect our entire region - Southwest Virginia. Our jurisdiction would have a difficult time qualifying for the High Priority Program under the proposed rules. With limited public transportation and topographical challenges that other parts of the state don't have, the eligible agencies would struggle to mold an application into the projected corridor types.

- 6. Eliminating HPP funding on a district-wide basis. To address the concern about small projects (projects with a cost estimate of < \$10 million) being funded through the High Priority Program (HPP), the Commonwealth Transportation Board is considering adjustments to how HPP funding is allocated. The current funding steps are as follows:**

Step 1 allocates each VDOT construction district's grant program funding on a district-wide basis.

Step 2 allocates HPP funding on a district-wide basis for projects that would've been funded through each district's grant program if they had been eligible to be submitted through that program.

Step 3 allocates HPP funding on a statewide basis.

The proposed change would eliminate the current Step 2 and would move straight from Step 1 to Step 3 shown above.

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Do you support eliminating the current second step of the funding allocation process?

Mount Rogers Planning District Commission does not support the elimination of Step 2 in this process. The PDC believes that this proposed change would unjustly score projects in our jurisdiction against projects in districts that score much higher in SMART SCALE matrix. The removal of this step would reduce our competitiveness at a statewide level. In the last four rounds of SMART SCALE, the highest statewide ranking any of our projects has achieved was 14, which was within the 96th percentile statewide. Most of our submissions rarely exceed the 50th percentile. Because of this, Step 2 of the allocation process gives applicants a more balanced funding opportunity.

- 7. SMART SCALE includes "land use coordination" as a scoring criterion in the evaluation of applications. The goal of the land use coordination measure as stated in the SMART SCALE Technical Guide is to "improve the consistency of the connection between local comprehensive plan goals for transportation-efficient land use and transportation infrastructure design, multi-modal accommodation, and system operations." Concerns raised about the current use of the land use score is that it accounts for where a project is located, not expected project outcomes. There is also concern that the land use score has disproportionately driven the types of projects that are selected for funding.**

To address these concerns, the Commonwealth Transportation Board is considering a change to eliminate land use as a standalone score. Instead, the Commonwealth Transportation Board is considering an adjustment to use the land use scoring factor as a multiplier - the calculated land use benefit would be converted to a multiplier and would be multiplied against the other calculated project benefits to enhance overall project benefits determined by the other scoring factors. Do you support the proposed change to the application of the land use scoring factor?

Elimination of the land use category from SMART SCALE scoring would be unfavorable to project submissions from our region. Several of our Round 5 submissions 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 improvements for several of our jurisdictions, as collisions are not consistently reported and thus do not factor into the crash data.

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In conclusion, the expressed concerns regarding the staff recommended changes to the SMART SCALE program highlight the significant impact these changes could have on rural areas across the Commonwealth. The proposed reductions in applications, and the shift towards entity performance will hinder small localities when securing 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, please feel free to contact me at mgraffl@mrpdc.org or (276) 783-5103 Ext. 305.

Thank you,

Mason Gragg
Transportation Planner
Mount Rogers Planning District Commission

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