



August 21, 2023

The Honorable W. Sheppard Miller, III  
Secretary of Transportation  
Office of the Secretary of Transportation  
Patrick Henry Building, 3<sup>rd</sup> Floor  
1111 East Broad Street  
P.O. Box 1475  
Richmond, VA 23218

Dear Secretary Miller and Members of the Commonwealth Transportation Board:

As the members of the Central Shenandoah Planning District Commission (CSPDC), we have closely followed the CTB's review of SMART SCALE and proposed policy changes. We are concerned about how the proposed changes will affect our region, its localities, and rural Virginia more broadly.

Our PDC works closely with our localities and VDOT District staff to select projects that are important to our region. Not all of these projects involve new roadway construction, widening, or rebuilding interstate interchanges. Rather, our region's priorities are multimodal and varied. For example, we submitted the I-81 MM 191-195 Truck Climbing Lanes extension project in FY20 (\$70 million), and the US 33 and Park Way RCUT project in FY24 (\$12.6 million). While the latter project was a cost-effective solution to address congestion and safety and a recommendation from the VDOT-led *US 33 Arterial Management Plan*, it would not be eligible for HPP funding under the proposed list of eligible project types.

We strongly encourage the CTB *not* to restrict the list of eligible project types for the High Priority Projects (HPP) program. Planning District Commissions and VDOT Construction Districts know their regions' needs, and should not be limited to a short list of project types that represent a narrow definition of transportation needs centered on congestion mitigation. The Congestion Mitigation Goal Area for our Type C and D communities is only 15% of our weighted benefit score in SMART SCALE. If the CSPDC region were to submit a HPP application that fits this proposed set of project types, it would score very poorly compared to projects in area Types A and B where congestion mitigation is weighted more heavily (45% and 35% respectively).

Safety is our region's top priority and one of our most heavily-weighted Goal Areas. The HPP program must allow for safety projects like Corridor Treatments, Regional Trails, and Park and Ride Lots to meet the varied needs of the Commonwealth, not just the Urban Crescent.

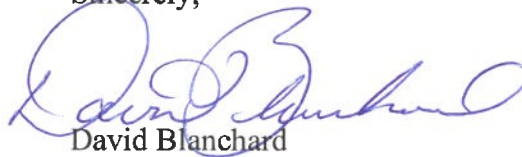
We wish to counter the narrative that SMART SCALE applicants submit smaller (<\$10 million) projects because they are more likely to be funded. We submit projects based on regional priorities, and our plans and studies focus on cost-effective solutions to regional challenges. If the CSPDC submits a bike and pedestrian project to SMART SCALE, it is because the project has regional support, and because the Transportation Alternatives Program is not sufficiently funded to support multi-million-dollar funding requests. In 2023, it costs \$2 million to build one mile of sidewalk, while the TAP program allocates \$2 million to an entire Construction District to fund projects over a two-year period. SMART SCALE must remain a multi-modal transportation funding program, and other funding programs must keep pace with the cost of building transportation infrastructure.

The proposal to reduce the number of applications for our Tier 1 region from four to two will place an undue burden on rural localities, and particularly Rockingham County, which has four towns that do not maintain their own roads and rely on the County to submit SMART SCALE applications on their behalf. Limiting the County to two applications effectively renders these towns ineligible for funding through SMART SCALE when the County regularly submits more than two applications for their own projects in each round.

Reducing the number of applications for rural communities combined with the proposed shortened list of eligible project types under the HPP program, plus a smaller number of eligible roadways (non-MPO counties do not have Regional Networks) *plus* the lack of regional transportation authorities in rural areas to leverage additional funds puts rural Virginia at a significant disadvantage in SMART SCALE. We simply will not be able to compete against more urban regions with more applications, and more projects that align with an urban-focused set of project types, and more leveraged funding.

Thank you for considering our concerns and doing what's right for all Virginians. We and our staff are available to meet about this matter should you wish.

Sincerely,



David Blanchard  
Chairperson

**CENTRAL SHENANDOAH PLANNING DISTRICT COMMISSION  
MEMBERSHIP ROSTER**

**NAME**

**REPRESENTING**

Butch Wells	Augusta County
Vickie Moran	Augusta County
Pam Carter	Augusta County
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Billy Fitzgerald*	Buena Vista
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Rhonda Cooper*	Rockingham County
Kim Sandum	Rockingham County
Amy Darby	Staunton
Sharon Angle*	Staunton
Terry Short*	Waynesboro
Jim Shaw	Waynesboro

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\*Executive Committee