



**CITY OF HARRISONBURG**  
**CITY COUNCIL**

HARRISONBURG CITY HALL  
409 SOUTH MAIN STREET, HARRISONBURG, VA 22801  
OFFICE (540) 432-7701 • FAX (540) 432-7778

August 22, 2023

The Commonwealth Transportation Board  
c/o 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  
PO Box 1474  
Richmond, VA 23218

Dear Secretary Miller and Members of the Commonwealth Transportation Board:

The City of Harrisonburg has been closely following the CTB's review of, and proposed changes to, the SMART SCALE program and has been receiving updates from the Harrisonburg Rockingham Metropolitan Planning Organization (HRMPO). We have concerns with the proposed changes and their impact to the City of Harrisonburg as well as our regional partners. The City agrees with and supports each point made in the HRMPO letter to the CTB regarding these matters and would like to add the following additional City perspectives:

The proposed changes represent a radical shift in the philosophy of SMART SCALE and are being pursued much too quickly. In prior years, program changes to SMART SCALE have been more modest and were based on a methodology to improve SMART SCALE. The proposed changes reflect a drastic change in the operation and the underlying philosophy of SMART SCALE. The review period for these proposed changes is not sufficient for our staff to adequately understand their potential impact and how they will affect our ability to seek funding for our transportation needs.

The proposed changes appear to be a way to eliminate specific project types and cater to larger, more urban, and vehicle-centric improvements, instead of adhering to *all* needs identified in VTRANS. They undercut the statewide planning effort that is intended to guide transportation investments and goes against the core tenants of the SMART SCALE program as it relates to the multimodal component of an effective and responsive transportation system.

We also disagree with the proposed decision to remove public transit from consideration within SMART SCALE. The City operates an active transit system, which is a key component to a safe and robust transportation network that supports the local economy. By eliminating the ability to seek capital funding for transit service expansion and improvements, combined with the reductions in opportunities to fund bicycle and pedestrian projects, these proposed changes further limit the ability to operate and grow the multimodal transportation system that is essential to Harrisonburg. The City is a member of the cohort of small urban areas in Virginia that seek to



**CITY OF HARRISONBURG**  
**CITY COUNCIL**

HARRISONBURG CITY HALL  
409 SOUTH MAIN STREET, HARRISONBURG, VA 22801  
OFFICE (540) 432-7701 • FAX (540) 432-7778

grow in more financially, environmentally, and equitably sustainable ways than are typically pursued in more established urban areas. We are disappointed that SMART SCALE, a critically important funding mechanism, is being retooled to reinforce outdated solutions that perpetuate old problems and to incentivize growing communities to follow those unsustainable models of growth.

Finally, we understand that it is nearly impossible to score all of the applications submitted to SMART SCALE, and it is an inefficient use of resources to do so when only a fraction of them can be funded. Submitting applications that have little chance of being funded waste resources of the submitting localities and VDOT staff. Adopting an application cap based on a locality's size is an easy way to limit applications, but it also eliminates the best method of producing the strongest application pool, because projects are selected in each round of SMART SCALE based on their performance compared to other submitted projects. By simply limiting application numbers based on a locality's size, the results will be fundable projects being unsubmitted and needed transportation improvements not being constructed. Before adopting this strategy, consider that Harrisonburg has met the current application cap in the past few application rounds. Harrisonburg has had a high success rate because it submits projects that score well. These successful projects have resulted in tangible, real world benefits to the Harrisonburg's residents, businesses, and industries. We encourage the CTB to determine a method of limiting applications that allows it to fund projects having the most merit, and a possible solution is to improve the preapplication process.

Thank you for considering our concerns. Please do not hesitate to contact us, should you have question about any of them. We will follow up with our Staunton District and Rural At-Large representatives to the CTB on this matter, as well.

Respectfully submitted,

Deanna R. Reed  
Mayor

**Harrisonburg City Council**  
Vice Mayor Laura Dent  
Councilman Christopher Jones  
Councilwoman Monica Robinson  
Councilman Dany Fleming