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September 6, 2023

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

Dear Secretary Miller and Members of the Commonwealth Transportation Board,

As the Policy Board of the Staunton-Augusta-Waynesboro MPO, 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 primary concerns are:

- Proposed eligibility requirements for the High Priority Projects (HPP) program
- The reallocation of Land Use percentage points to other Goal Areas
- The reduced cap on applications in Tier 1 regions of the State

We request that you revisit these proposed policy changes.

HPP Eligibility: Our MPO works closely with our localities and VDOT District staff to select projects from the MPO's Long Range Transportation Plan 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 Wilson Workforce Rehabilitation Center Long Term Improvements project—a new road construction project — in 2022 for \$20.8 million as well as the Rosser Avenue (US 340) Corridor Improvements in 2022 for \$1.5 million, and the Greenville Avenue (US 11) Roadway Reconfiguration in 2022 for \$3.7 million for High Priority Project (HPP) funding. All three projects are regional priorities in SAWMPO's Long Range Transportation Plan on a Regional Network or a Corridor of Statewide Significance roadway, but the latter two cost-effective operations and safety projects would be ineligible for HPP funding with the proposed limited eligibility requirements.

We strongly encourage the CTB to expand the proposed list of eligible project types for the HPP program. MPOs, 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. Safety is our region's top priority and one of our most heavily-weighted Goal Areas.

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 SAWMPO region were to submit a HPP application that fits this proposed set of eligible 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).

To meet the needs of the Commonwealth, not just the Urban Crescent, the HPP program must include corridor treatments and bundled projects that support improved safety and operations on Corridors of Statewide Significance and Regional Networks, and large-impact multimodal projects that will contribute to overall system capacity.

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 large and small based on local and regional priorities, and our plans and studies focus on cost-effective solutions to regional challenges. If the SAWMPO submits a bike and pedestrian project to SMART SCALE, it is because the project has the community and elected leaders' support, and because the Transportation Alternatives Program is not sufficiently funded to support multi-million-dollar funding requests. In 2023, it cost \$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.

Land Use Goal Area: We support the Land Use Goal Area due to its success in documenting the benefits of coordinating transportation investments with land use across Virginia. If the Land Use Goal Area score is to be converted to a multiplier and the Goal Area weights assigned to the other Goal Areas, we request that for Type C and D regions the additional ten percentage points go to Safety rather than splitting them between Safety and Congestion Mitigation.

Application Cap: 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 counties with towns who rely on the county to submit SMART SCALE applications on their behalf. Limiting a county to two applications effectively renders these towns ineligible for funding through SMART SCALE when the localities regularly submit 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



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transportation funding authorities in rural areas to leverage 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, more projects that align with an urban-focused set of project types, and more leveraged funding.

Thank you for considering our concerns. Please do not hesitate to contact us if you have questions for us. We will follow up with our Staunton District and Rural At-Large representatives to the CTB on this matter as well.

Sincerely,

A handwritten signature in black ink, appearing to read "Carolyn Bragg". The signature is fluid and cursive.

Carolyn Bragg, Chair, Augusta County
Staunton-Augusta-Waynesboro MPO

SAWMPO Policy Board Members:

Brad Arrowood, Vice Chair, City of Staunton

Amanda Kaufman, City of Staunton

Tim Fitzgerald, Augusta County

Jim Wood, City of Waynesboro

Todd Wood, City of Waynesboro

Todd Stevens, VDOT