



County of Roanoke

Board of Supervisors

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October 27, 2023

The Honorable W. Sheppard Miller III
Secretary of Transportation
Commonwealth of Virginia
1401 East Broad Street
Richmond, Virginia 23219

Subject: Proposed SMART SCALE Round 6 Changes

Dear Secretary Miller,

Roanoke County has been closely monitoring the review of the SMART SCALE process, including the October 17 Commonwealth Transportation Board (CTB) meeting. While we expect that each proposed SMART SCALE change will negatively impact Roanoke County's ability to obtain future funding through SMART SCALE, I wanted to bring the most impactful concerns and ideas to your attention:

Amend the application cap to recognize the Transportation Management Area status of the Roanoke Valley Transportation Planning Organization (RVTPO).

- Roanoke County requests that the Tier 2 Metropolitan Planning Organization (MPO) threshold be lowered to 200,000, which is the population threshold to be designated a Transportation Management Area.
- With a population of 239,000, the RVTPO is disproportionately affected by the proposed cap change, as most other MPOs in the 250,000 and under cap have populations less than 100,000.

Keep the existing High Priority Projects (HPP) definition and Step Two.

- Because of the urban nature of the proposed redefined HPP project types, suburban and rural Roanoke County has very few opportunities to submit projects that meet the new HPP definition.
- Combined with the elimination of Step Two, where Roanoke County (via the RVTPO) was successful with our only two projects in Round 5, Roanoke County will effectively be unable to obtain any HPP funding.

Carve out funding specifically for small projects under \$10 million, such as pedestrian, bicycle and safety projects.

- By dedicating a set amount of funding for small projects, they would no longer compete against larger-scale multimodal roadway, mass transit and rail initiatives.

Recognize the importance of bringing new businesses to existing structures and existing business expansion in Economic Development scores.

- The largest economic announcement in Roanoke County history at the Wells Fargo Call Center (1,100 new jobs) was predicated in part on the \$14 million of multimodal corridor funding invested over the last decade.
- There are many areas throughout Roanoke County that are ripe for similar expansion and/or redevelopment, utilizing existing buildings, that cannot be measured by the Economic Development changes proposed.

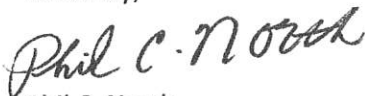
Reconsider the Land Use calculation to eliminate the vast score inflation for projects under \$5 million and significant undervaluation for projects \$10 million and over.

- Inflated scores were not due to the land use criteria, but because of the way the SMART SCALE score is calculated. This was the case for all projects statewide that scored above 30.0 in Round 5.
- The chart below illustrates how SMART SCALE scores shift drastically depending on how close they are to \$10 million. Changing the land use criteria to a multiplier does not solve this underlying issue and will hurt projects that prioritize transportation and development-efficient land.

SMART SCALE Scores, 6.4 benefit score at various costs		
Cost	Benefit/Cost	SMART SCALE Score (benefit/cost)*10m
\$408,116	0.00001568	156.8
\$5,000,000	0.00000128	12.8
\$10,000,000	0.00000064	6.4
\$20,000,000	0.00000032	3.2
\$408,116 cost at 6.4 benefit was the highest scoring SMART SCALE project from Round 5, ID 8952 Windsor to Suffolk Commuter Bus Service		

Roanoke County appreciates your consideration of these comments. Please feel free to contact me with any questions by email at pnorth@roanokecountyva.gov or by phone at (540) 283-8103.

Sincerely,



Phil C. North

Roanoke County Board of Supervisors, Hollins District

cc: Dr. Raymond D. Smoot Jr., Salem District Member, CTB
Commonwealth Transportation Board Members
Delegate Terry L. Austin
Delegate Christopher T. Head