



Roanoke Valley Transportation PLANNING ORGANIZATION

A Program of the
REGIONALcommission

313 Luck Avenue, SW | Roanoke, Virginia 24016
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October 31, 2023

the Honorable W. Sheppard Miller, III
Secretary of Transportation
Patrick Henry Building
1111 East Broad Street
Richmond, VA 23219

Re: Proposed SMART SCALE Round 6 Changes

Dear Secretary Miller:

The Roanoke Valley Transportation Planning Organization continues to carefully evaluate the proposed revisions to the SMART SCALE process. Based on information presented during the October 17-18 meeting of the Commonwealth Transportation Board, we believe the following list of recommendations would position our region to remain competitive in the SMART SCALE process with minimal disruptive impact on current planning efforts.

- **Retain the current definition of qualifying High Priority Projects:**
 - The current definition of High Priority Projects in the Code of Virginia allows for a diversity of project types, many of which are priorities for our region.
 - Narrowing the definition would provide fewer opportunities for many of our member localities to compete for HPP funding.
- **Retain Step 2 in the SMART SCALE scoring process:**
 - Step 2 allows districts across the Commonwealth to submit and receive funding for impactful projects with local, regional, and statewide benefits.
 - Small projects have played a critical role in securing economic development opportunities in our region.
 - A dedicated funding pool for small projects under \$10 million would sustain investment in pedestrian, bicycle, and safety projects.
- **Lower the Tier 2 population threshold under the proposed Scenario 3 for applications to the federal threshold to be designated a Transportation Management Area (200,000)**
 - The federal threshold of 200,000 would provide one additional project submission by the RVTPO.
 - Because the RVTPO currently serves a population of 237,000, the proposed cap would create an inequity as the other MPOs in Tier 1 serve much lower populations.

In addition to the above recommendations, we continue to have concerns about the proposed changes to the economic development scoring methodology. While we share the Commonwealth's goal to advance projects on greenfield sites with high return on investment, many successful economic



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development projects in our region have come through business expansions on company-owned real estate. We hope to continue dialogue on economic development scoring criteria that would consider these types of economic development projects.

If you have any questions about the concerns outlined above, please do not hesitate to contact me. As always, we look forward to our continued partnership in developing a safe and reliable transportation system in the RVTPO region.

Sincerely,

Phil North
Chairman