



November 13, 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,

Botetourt County has actively followed the Commonwealth Transportation Board's review of the SMART SCALE program and proposed policy changes. We feel that the proposed changes to the SMART SCALE program will be detrimental to the County's success in the funding process. Generally, our concerns include:

- Changes to the economic development measurement.
- Impacts to pedestrian-oriented projects that exceed the cost of the Transportation Alternatives (TA) Program.
- Proposed eligibility requirements for the High Priority Projects (HPP) Program.
- Removal of Step 2.
- Reduction in total allowed applications per locality.
- Changes to the Land Use Goal measure.

### **Changes to the economic development measurement.**

Botetourt County has been strategic in developing tools and forging relationships that have had a direct impact on economic development. The County has even earned statewide recognition for one such tool, the Gateway Crossing Overlay, at the 2023 conference of the Virginia Chapter of the American Planning Association. This success has also brought challenges including added strain to the road network and a need for safety improvements. By amending the economic development measurement to only include project sites found in VSCAN, the Commonwealth is downplaying and disregarding the bedrock of economic development: our small and medium-sized businesses. VSCAN is an excellent tool for finding sites for new economic development, but completely ignores the economic development that happens daily in our county including new, locally owned businesses and expansion of such businesses.

Two additional points of contention with the economic development scoring factor is in its disregard of multifamily developments and the timeframe for review of economic development projects. New housing is a statewide need and multifamily developments bring tax revenue into local governments

and introduce new workers into the labor force. They also have a notable impact on the road network and can be detrimental to capacity preservation and efficiency. Despite this, multifamily developments have no bearing on the scoring of a project.

The timeframe for review of economic development projects fails to capture all development impacting the road network. A project may receive site development and building approval and be completely closed out prior to the next round of SMART SCALE. Does the project not have an impact on the road network? Clearly, that project does impact the road network, however there is no adequate mechanism to capture these projects for improved scoring.

The County understands the time and effort spent by VDOT staff to validate economic development sites through the scoring process and agrees that manual validation is costly. However, Botetourt *strongly* urges the CTB to reconsider the proposed changes to the economic development measurement as it emphasizes a tool that was *never* intended to inform transportation planning decisions. Botetourt also asks the CTB to include new residential development into scoring factors and to find a way to better capture economic development happening between SMART SCALE rounds.

### **Impacts to pedestrian-oriented projects that exceed the cost of the Transportation Alternatives (TA) Program**

The proposed changes to the SMART SCALE process appear to have a significant detrimental effect on pedestrian projects. Simply stated, the TA Program has historically been underfunded and unable to meet the funding needs of pedestrian projects. Rising costs have played a major role in this as costs for materials and labor have skyrocketed, pricing many projects out of the funding limit per project for the TA Program. Pivoting away from funding pedestrian projects through SMART SCALE does not encourage localities to apply for funding through TA; instead, it will only kill important pedestrian projects entirely.

### **Proposed eligibility requirements for the High Priority Projects (HPP) Program.**

High Priority Projects are of critical importance to the Commonwealth, and we applaud efforts to better distribute funds for projects that have a large impact on the transportation network. We recognize the importance of delivering funding to large projects and understand the need to refine definitions of "what" type of projects are considered High Priority Projects. Our concern stems from the narrowed definition of these projects, and we encourage a thorough consideration of other feature types for inclusion.

### **Removal of Step 2.**

Removal of Step 2 has the potential to greatly reduce the funding of projects within the Salem district and other districts across the Commonwealth, especially in rural populated areas of Virginia. We understand that Round 5 saw 49 percent of HPP funds distributed to projects with a district focus. While this has been reported to the CTB as a high percentage, removal of Step 2 is drastic. A further refinement of Step 2 could serve to achieve the aims of distributing more HPP funds to projects with a statewide focus, without completely removing this valuable funding opportunity for district-wide projects.

### **Reduction in total allowed projects per locality.**

Botetourt County asks the CTB to reconsider the reduction in total allowed projects from four to three. A reduction in the allowed projects per locality can and will stunt project development and delivery in the commonwealth. The maximum number of four has provided Botetourt County the ability to apply for projects that have benefits outside of the primary focus for transportation improvements along the US 220 corridor. For example, the County was approached by several community partners with a project to improve safety along Valley Road (SR 779) as it meets the Appalachian Trail. Without the fourth slot,

the County would not have been able to apply for this project and the other high-priority projects along the US 220 corridor, delaying it for an additional two years or more.

**Changes to the Land Use Goal measure.**

In consideration of proposed changes to the Land Use Goal measure, we echo the points made by the Staunton Augusta Waynesboro Metropolitan Planning Organization in their letter to the Commonwealth Transportation Board dated September 6, 2023, stating:

“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 Management.”

The SMART SCALE program has been evaluated each cycle to improve upon its purpose of equitably and scientifically distributing limited funds across the Commonwealth. We applaud those efforts to continuously seek improvements and to refine a process that impacts every single Virginia citizen. We appreciate the opportunity to submit comments and concerns through this review process.

Sincerely,



Gary Larowe  
County Administrator  
Botetourt County

C: The Honorable Terry L. Austin, Delegate  
Dr. Donald M. Scothorn, Chair, Board of Supervisors, Botetourt County  
Mrs. Amy S. White, Vice-Chair, Board of Supervisors, Botetourt County  
Mr. David V. Moorman, Deputy County Administrator, Botetourt County