



Northern Virginia Transportation Authority

The Authority for Transportation in Northern Virginia

The Honorable W. Sheppard Miller III
Secretary of Transportation
Office of the Secretary of Transportation
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, VA 23219

November 13, 2023

Dear Secretary Miller and members of the Commonwealth Transportation Board,

The Northern Virginia Transportation Authority (Authority) appreciates the Commonwealth Transportation Board's (CTB) efforts in evaluating the SMART SCALE Program and the effectiveness of the project selection criteria. Since 2013, the Authority has invested \$3.1 billion toward 122 regionally significant, multimodal transportation projects throughout Planning District 8. NVTA represents the regional transportation interests of Planning District 8, which includes Arlington, Fairfax, Loudoun and Prince William counties, the cities of Alexandria, Fairfax, Falls Church, Manassas and Manassas Park, and the towns of Dumfries, Herndon, Leesburg, Purcellville, and Vienna. Through the adoption of the Authority's goals to improve mobility, accessibility, and resiliency across all modes – which include roads, transit, walking, and bicycling – these investments are aligned with the Authority's Core Values to ensure the projects are effective, equitable, sustainable, and safe. Together with local, state, and federal funding sources such as SMART SCALE, these investments not only help improve the economy of Northern Virginia and the Commonwealth, but also the overall quality of life of residences and businesses.

Per the Code of Virginia 33.2-2509, "The amounts deposited into the [Northern Virginia Transportation Authority] Fund and the distribution and expenditure of such amounts shall not be used to calculate or reduce the share of federal, state, or local revenues otherwise available to participating jurisdictions." Although Northern Virginia received just 9% of the overall funds for Round 5 of SMART SCALE, we are confident that some of the recommended changes will provide better focus and priority on those multimodal projects that benefit not only the region but the Commonwealth at large. As such, we'd like to offer the following comments on the proposed changes:

Eliminating Step 2 for High Priority Program (HPP) Funding

- **The Authority supports the recommendation to eliminate step-two for High Priority Program (HPP) funding eligibility.** Eliminating this step will enable well-scoring projects that are unable to be funded with District Grant Program funds to access HPP funds, thereby funding the highest performing projects, not just those with the lowest costs. This will allow for truly regionally and statewide significant projects, those that yield the greatest impacts, an opportunity to be funded.

Application Limits

- The Authority understands that the submission of complete applications is critical to properly evaluate and assess the merits of the proposed projects. However, **the Authority disagrees with the recommendation to reduce the cap limit for the number of applications submitted.** Given

the population, number of independent towns and diverse modal needs of Northern Virginia, implementing a cap on the number of applications will likely contribute to additional delays in the efforts of the region to address the backlog of essential transportation projects. As Northern Virginia has the most towns of any region, reducing the cap would impede opportunities for state funding both the town and counties. Our biannual Six Year Program also requires the submission of applications, making us sympathetic to the staff resources required to review applications, particularly those that are incomplete. We believe a first step solution is to adjust the application portal so that applications will be automatically rejected if the desired level of specificity isn't achieved. Doing so will inform the applicant of the areas they need to work on for the application to be accepted and should greatly reduce the time staff has to devote to incomplete applications.

Congestion Mitigation

- **The Authority supports the recommendation to calculate congestion benefits for 10 years in the future.** As in SMART SCALE, congestion mitigation is a statutorily mandated priority for long-range transportation planning and project funding selection for the Authority. Mitigating congestion through multimodal means on the region's transportation network enables improved mobility and enhanced quality of life. The Authority analyzes future traffic conditions to adequately assess the benefits of candidate projects. In contrast, SMART SCALE uses data from previous years to represent current traffic conditions for the funding of projects that will be implemented 5, 10, or 15 years later. It is imperative when allocating out-year funding, to understand the impact that projects will have on the transportation network when the projects are implemented/open to traffic.

Additional Comments

- **Bus Rapid Transit Projects:** For the purposes of project evaluation, we request that the definition of Bus Rapid Transit (BRT) projects be expanded to include all configurations of BRT including but not limited to transit-only lane/exclusive-median transitway and fixed guideway. Ensuring that the eligibility criteria is comprehensive and recognizes the value in all high-capacity transit options, helps to achieve the goals of SMART SCALE and the region. BRT in all forms should be specifically recognized as an eligible project type for HPP.
- **Multimodal Transportation Network:** Connectivity between modes is an important part of any multimodal transportation network. Having a performance-based project evaluation system such as SMART SCALE that fairly evaluates all modes of transportation will be imperative for the region, as well as the Commonwealth, to continue making investments that serves urban, suburban and the rural needs of Virginians.

Thank you for your consideration. Please contact us if you have any questions.

Sincerely,



Monica Backmon
Chief Executive Officer, NVTA

CC: NVTA members