



West Piedmont Planning District Commission

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November 13, 2023

Carol Mathis
Assistant Secretary to the Board
Commonwealth Transportation Board
1401 East Broad Street
Richmond, VA 23219

Dear Ms. Mathis,

The West Piedmont Planning District Commission (WPPDC) and Danville Metropolitan Planning Organization (Danville MPO) wish to submit the following comments to the Commonwealth Transportation Board (CTB) in regard to the proposed changes to Smart Scale which are intended to take effect during Round 6 of the process. The WPPDC and Danville MPO extend appreciation to the CTB for graciously accepting and considering these comments.

- With regard to changes to the “ED.1” proposal, we express our concern that eliminating square footage and site plan status of commercial and mixed-use sites, as had been incorporated in recent rounds of Smart Scale, and instead relying only on those sites within the VEDP VirginiaScan database, will limit opportunities for communities within our region to provide appropriate transportation infrastructure to serve future developments. We also believe this change will put many of our region’s communities at a disadvantage when competing with localities having additional assets and resources, in the context of Smart Scale.
- While we understand the motivation for the CTB proposing to reduce the number of Smart Scale applications (from 4 to 3 in our Tier 1 region), the result would be fewer opportunities for our regional partners to apply for needed transportation improvements, as well as fewer opportunities for us to submit applications on behalf of our regional partners.
- While we disagree with many of the proposals put forth by the CTB intended to take effect during Round 6 of Smart Scale, we are especially concerned about the Board’s proposals to radically alter the High Priority Projects (HPP) Program. Eliminating “Step 2” of the process would reallocate HPP funds statewide, thereby forcing smaller, more rural regions to compete against much larger regions with greater resources. We believe HPP funding should continue to be scored based on a regional approach to enable localities in the same region to compete on more of a “level playing field.”

We further disagree with the CTB’s proposal to limit projects that may be applied for via the HPP to the largest of projects, as this will have two deleterious impacts on our region. The first effect will be the elimination of a funding source for important spot improvements that would impact roadway safety and capacity in our region, as well as strip funding from many bicycle and pedestrian projects – ensuring that Virginia’s transportation network remains automobile-oriented. Second, our region’s localities often struggle to fund basic roadway improvements such as intersection improvements and reconfigurations. Thereby, excluding HPP funding from all but the largest of road, rail, and transit investments will strip our organization and our regional partners of a critical funding source which has funded needed transportation infrastructure investments that enhance the safety and functionality of our region’s transportation system, while promoting the marketability of our region.

- We disagree with the CTB's proposal to reallocate the Land Use factor as a multiplier of other factors, as we believe this would dilute the effectiveness of the Land Use factor. The built environment plays a significant role in a safe and functional transportation network – particularly when coupled with bike and pedestrian infrastructure. Therefore, we believe a much more practical compromise would be for the CTB to maintain the Land Use Factor mechanism as-is, while either reducing or capping the number of points any application could accrue from that factor.

Again, thank you for the opportunity to express our concerns to the Commonwealth Transportation Board regarding the proposed changes to Round 6 of Smart Scale.

Sincerely,

A handwritten signature in cursive script that reads "Kristina Eberly".

Kristina Eberly,
Interim Executive Director/Danville MPO Administrator