



November 14, 2023

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

RE: Smart Scale Program Changes

Dear Secretary Miller:

Franklin County understands that the Commonwealth Transportation Board (CTB) has been considering several changes to the current requirements of the Smart Scale Program and are expected to act on these proposed changes in the coming months. Franklin County has been successful in obtaining funding through the Smart Scale program in the past and we appreciate the support that you and the CTB have given to Franklin County.

Franklin County desires to express some concerns regarding the proposed revisions to the Smart Scale Program. Franklin County does have a concern that the proposed revisions (and previous revisions) to the Smart Scale Program continue to have a negative effect on smaller, rural counties like Franklin County. In general terms, the proposed revisions, in tandem with previous revisions, result in Smart Scale applications becoming increasingly complex. Further, the cost to prepare viable applications continues to increase, particularly if the locality is not able to secure Virginia Department of Transportation (VDOT) support and/or services. Without VDOT support, many rural localities must rely on set-aside funding to secure engineers and other qualified professionals to prepare and submit an application, as rural counties may not have the necessary professionals on staff. Unfortunately, this is a cost that many rural localities do not have the capacity to bear prior to a project being funded or secured.

Specific changes currently being considered like those proposed to the High Priority Projects (HPP) definition and elimination of step two will result in fewer opportunities for Franklin County and other rural counties to submit projects that meet the new HPP definition.

In conclusion, previous revisions to the Smart Scale program have resulted in criteria that can often be difficult for rural localities to meet; the proposed changes exacerbate an already existing concern and may make it increasingly difficult for many rural localities to meet the Smart Scale program criteria sufficiently enough to not only have a viable application, but to have a fighting chance to qualify for funding, comparatively to larger and more urban localities. These changes to Smart Scale and insufficient SSYP funding for secondary roads and unpaved roads continue to create challenges for our transportation network.

Thank you for hearing our concerns and we request that you and the entire CTB consider the effect that these changes may likely have on rural Virginia.

Sincerely,

*Steven M. Sandy*

Steven M. Sandy, AICP, CTM  
Assistant County Administrator

Cc: Franklin County Board of Supervisors  
Senator William Stanley  
Senator David Suetterlein  
Delegate Wren Williams  
Delegate-Elect Will Davis  
Christopher Whitlow, County Administrator