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November 14, 2023

The Honorable Sheppard Miller III
Secretary of Transportation and
Chair, Commonwealth Transportation Board
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, Virginia 23219

SMART SCALE Process Review Team
Office of Intermodal Planning and Investment
SmartPortal@CTB.Virginia.gov

Dear Secretary Miller and SMART SCALE Process Review Team,

Thank you for the opportunity to provide comments on the SMART SCALE review process. We applaud the Commonwealth Transportation Board's (CTB) and Office of Intermodal Planning and Investment's (OIPI) time and effort to develop policy refinements that will lead to improved program outcomes. Given the current timeline for the Commonwealth Transportation Board's adoption of the proposed SMART SCALE changes, we felt it important to share the Commission's comments on the proposal as quickly as possible. That said, on behalf of the Commission, we would like to extend an open invitation to the Secretary's Office and OIPI to meet with the Commission and dialogue over the proposed changes. SMART SCALE has played a critical role in funding multimodal projects that enhance mobility across Northern Virginia and we believe it is a best-in-class program in implementing data-driven transportation solutions.

In Northern Virginia, we have a robust roadway network of highways, managed lanes and arterials that for decades has been plagued by some of the highest levels of congestion in the Commonwealth. At NVTC, we recognize public transportation solutions offer the best way to avoid chronic congestion and maintain a thriving economy. As the current SMART SCALE scoring process awards proposals that reduce congestion, increase accessibility and enhance safety, it's no surprise transit projects have scored so well not only in Northern Virginia but across the Commonwealth. We urge the CTB to continue to emphasize the importance of public transit within the SMART SCALE scoring process by applying reasonable weighting to the factors that incentivize public transit: congestion reduction, land use and accessibility.

Specifically, we recommend the following factor weights for Typology A, in addition to several factor-specific recommendations:

- **Safety – 20**
- **Congestion Mitigation – 40**
 - Recommend two measures for congestion instead of only looking at future congestion: 50% for present-day congestion and 50% for 10 years in the future.
- **Accessibility – 25**
 - Recommend adjusting Accessibility measure weights to **A.1 – 40%, A.2 – 20% and A.3 – 40%**
- **Environmental Quality – 10**
- **Economic Development – 5**
 - The measures for Economic Development should focus on sustaining and supporting growing and already-established businesses.

There are significant transportation needs in our region. The existing cap of 10 applications for larger jurisdictions already disadvantages Northern Virginia where several localities far exceed the 200,000-population minimum required to submit up to 10 applications. We recommend the CTB consider keeping the number of eligible applications per applicant the same, as reducing the number of applications would not in itself guarantee better quality applications. OIPI should simplify application materials and rely on project readiness assessments as determined by respective VDOT District staff.

Regarding project scope and funding program eligibility, we encourage the CTB to explicitly allow corridor redevelopment solutions that collectively move more people, enhance safety and streamline operations across various transportation modes. We've seen corridor redevelopment and operational improvements create greater outcomes in Northern Virginia than piecemealing smaller project concepts together over time. Chief among the corridor-based project types we believe are most worthy of limited transportation funding resources is bus rapid transit, or BRT. We ask that the CTB list BRT (as defined in 49 USC 5302 (8)) as a qualifying project type under the new High Priority Projects Program (HPP) definition as on-the-ground realities in Northern Virginia make it such that many BRT concepts will often operate in mixed traffic and may not always require dedicated right-of-way. We also suggest including innovative intersections, transportation demand management strategies, signals and access management explicitly as tools within corridor redevelopment and eligible for the HPP.

We understand SMART SCALE policy will continue to change over time, but we encourage the CTB to consider the impacts of a substantial policy overhaul in what has been an overwhelmingly successful, award-winning program. Thank you again for the opportunity to submit comments as you endeavor to improve SMART SCALE program policy and processes.

Best regards,



Dalia Palchik
NVTC Chair

CC: Members of the Commonwealth Transportation Board
Carol Mathis, CTB Board Administrator