



November 14, 2023

W. Sheppard Miller, III
Secretary of Transportation
Chair of the Commonwealth Transportation Board
1401 E. Broad Street
Richmond, VA 23219

RE: Proposed SMART SCALE Program Changes

Dear Secretary Miller:

The Richmond Regional Transportation Planning Organization (RRTPO) appreciates the efforts of the Office of Intermodal Planning and Investment and the Virginia Department of Transportation to evaluate the effectiveness of the SMART SCALE process in delivering the most critical transportation needs to the Commonwealth of Virginia. While we understand and support the goals of this review, we are concerned about the overall lack of metropolitan planning organization (MPO) and other regional body stakeholder involvement in the development of the proposed recommendations. We believe the recommendations could be improved with broader stakeholder engagement and consultation in this undertaking.

In addition to our concerns about the process by which the changes were developed, we have concerns with their substance. When SMART SCALE was originally introduced, there was a commitment by the Secretary of Transportation's office that applications would be simple and would not require submitting agencies to hire consultants to fill them out and VDOT would be responsible for gathering data to evaluate projects. In spite of this commitment, the readiness requirements have increased with each round, and our member localities and agencies have been required to invest significant time and resources to meet the SMART SCALE program requirements.

The RRTPO strongly opposes the proposed decrease to the application limits. Limiting applications will mean further delays in delivering needed transportation improvements in the Richmond region. The RRTPO is actively engaged with PlanRVA and the Central Virginia Transportation Authority in planning and implementing transportation projects, with VDOT's and the CTB's cooperation. We are concerned that this momentum will be hindered by the proposed limitations.

In reviewing the proposed changes to the program, we were encouraged to see the proposal to make the high-priority project (HPP) program truly statewide through the elimination of step 2 in the funding process. We were also pleased to see the

proposed streamlining of the economic development factor in coordination with the Virginia Economic Development Partnership, reducing the burden on project sponsors.

While some of the changes appear to be positive, the RRTPO is very concerned about the decision not to include MPOs in the development of these proposed revisions to the SMART SCALE program. MPOs are federally mandated decision-making bodies charged with carrying out regional transportation planning processes. We appreciate the updates provided by OIPI and Richmond District staff; however, the Code of Virginia requires the Commonwealth Transportation Board to develop the statewide prioritization process cooperatively with MPOs (Code of Virginia § 33.2-214.1.B). Given the lack of substantive MPO involvement in the review process, we respectfully request that implementation of any proposed changes to the program be delayed until the MPOs and other stakeholders in our region and throughout the state can be fully included in the review process.

Thank you for considering our concerns. We look forward to working more collaboratively and cooperatively with you, VDOT, and the Commonwealth Transportation Board to meet Virginia's transportation needs.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Winslow", written in a cursive style.

Christopher Winslow
RRTPO Chair

copy: J. Rex Davis
John Lawson
Stephen C. Brich
Brooke Jackson
Dale Totten