



November 9, 2023

Commonwealth Transportation Board
Office of Intermodal Planning and Investment
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, Virginia 23219

Dear SMART SCALE Process Review Team:

Sierra Club Virginia Chapter thanks you for the opportunity to provide input on the current review and proposed changes for Virginia's SMART SCALE process. SMART SCALE received the State Transformation in Action Recognition (STAR) award from the Southern Legislative Conference of the Council of State Governments because of its creative approach to solving problems and issues, its far-reaching benefits and solutions, its ability to transfer best practices to other states, and its overall success in operating effectively and efficiently. We hope the current review results in an even stronger process that moves Virginia toward a sustainable future, rather than a road and highway-focused strategy that inadequately addresses the environmental, health, and economic challenges we face; challenges that require a strategy focused on moving people rather than cars. Our recommendations:

- **Preserve prioritization and funding for non-motorized transportation projects:** One of the greatest strengths of the SMART SCALE program is that it has enabled localities to move forward with relatively inexpensive projects like new trails, sidewalks and street connections that make it much easier and safer for people to get where they need to go on foot, by bike or other non-motorized travel modes. We urge that any adjusted weightings be tested to ensure that they preserve funding and prioritization of these active, healthy and less polluting transportation projects.
- **Increase the weight of the Environment factor.** SMART SCALE'S environmental quality factor, which scores a project's potential to improve air quality and reduce greenhouse gas emissions, is only weighted at 10%. Given that nearly half of Virginia's climate pollution is produced by transportation, the weighting should be increased. Road-widening projects draw more vehicles, increasing tailpipe pollution. Transit and bike/pedestrian projects reduce transportation-related emissions.

Investing in more transit and safer, more accessible walking and cycling infrastructure is an investment in the well-being of Virginia's residents. Bike and pedestrian projects positively impact public health. Such investments underscore the importance of equity and accessibility in transportation planning. Not everyone can afford a car, and not all communities have equal access to public transit. By increasing investment in transit and bike/pedestrian infrastructure, the state can ensure that transportation options are available to all, regardless of income or location.

- **Expand the definition of the type of projects that qualify as HPP.** Proposed changes to the definition of High Priority Project (HPP) would eliminate many beneficial transit projects. Bus rapid transit and other projects that benefit the public and reduce both greenhouse emissions and congestion should be eligible for consideration as HPPs. In



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mixed use and more densely populated areas – including smaller towns as well as inner-ring suburbs and cities – there is capacity to move large numbers of people through traffic corridors, with the potential for positive regional transportation impacts. In recognition of this, projects such as innovative intersections, transportation demand management strategies, and signals and access management should also be eligible for HPP status.

- **Retain Land Use as a factor.** Land use and transportation are inextricably linked; therefore, land use should continue to exist as an important consideration in the SMART SCALE process. For example, it makes sense to fund transit projects that include accessible pathways to bus and train stations in densely populated areas. Transit-oriented development lowers greenhouse gas emissions, reduces congestion, improves public health, and benefits the economy.
- **Include all relevant costs when weighing the benefits per dollar of transportation projects.** The Commonwealth Transportation Board should consider including the cost of public health issues and climate disasters associated with transportation pollution, in order to gain a more accurate estimated cost of transportation projects. Highway widening projects that carry more cars and trucks are costlier in terms of increased emissions pollution that exacerbates respiratory and cardiac illnesses, and contributes to more severe storms and droughts. Transit, sidewalk and bike trail projects lower the amount of emissions that make people sick and contribute to costly weather-related crises. A 2021 study published by the National Institutes of Health and authored by researchers at Seattle Children’s Research Institute, Kaiser Permanente, and the University of British Columbia found that high transit users had lower total health care costs (59–69% of non-user’s costs) and medication costs (31–37% of non-users’ costs) than non-users of transit. The true cost of expanded roadways encompasses much more than the price of construction materials and labor.

Thank you again for this opportunity to provide input on the SMART SCALE process. If you have any questions on Sierra Club’s recommendations, please let me know.

Regards,

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