July 30, 2020

The Honorable Mitch McConnell
Majority Leader, United States Senate
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker, United States House of Representatives
Washington, DC 20515

The Honorable Charles Schumer
Minority Leader, United States Senate
Washington, DC 20510

The Honorable Kevin McCarthy
Minority Leader, United States House of Representatives
Washington, DC 20515

Dear Leader McConnell, Speaker Pelosi, Leader Schumer, and Leader McCarthy:

The National Association of Regional Councils (NARC), the Association of Metropolitan Planning Organizations (AMPO), and the National Association of Development Organizations (NADO) – which represent the nation’s regional, rural, and metropolitan planning organizations and the elected officials that serve them – are writing in regards to provisions we support including in the next COVID-19 relief package.

First, we strongly support the approach the House took in the HEROES Act to supplement local transportation funding needs. By providing supplemental funding to state departments of transportation and suballocating a portion of that funding to local areas, much needed resources would be provided to local governments to ensure the continuation of vital infrastructure projects. We support increasing the total funding level to $37 billion, the amount requested by state departments of transportation; we request that these funds be provided to local areas of all sizes, not just the largest metropolitan areas; and we ask that these funds be provided at 100% federal share, reducing the burden on local governments to provide funding match in such uncertain economic conditions.

We also encourage Congress to include the following provisions in any forthcoming COVID-19 relief legislation:

- Provide additional funds to metropolitan, regional, and rural planning organizations through the Metropolitan Planning (PL) program, Federal Transit Administration planning funding, and the State Planning and Research (SPR) Program. Collectively, planning organizations anticipate tens of millions of dollars in unanticipated spending from additional IT expenses, additional sick time and health care costs, loss of productivity, and project delays. Additional and robust funding can help ensure they are able to continue their important efforts at the regional level to support the public health response and prevent staffing losses that could hamper the expenditure of recovery funds over time. These additional planning funds should be provided at 100 percent federal share, to reduce the burden on local areas and to ensure the availability to utilize these funds during times of critical challenges to local budgets.

- Utilize the Surface Transportation Block Grant Program (STBGP) (23 U.S.C. § 133) under the federal-aid highway program and public transportation program for stimulus spending. Distribute this funding using existing formulas and suballocation procedures under 23 U.S.C. §133. Remove local match requirements so federal funds can cover 100% of a project’s costs.
• **Allow funds provided in a stimulus bill to be used as the local share funds for any program**, including Surface Transportation Block Grant Program, Congestion Mitigation and Air Quality, and Metropolitan Planning. Allowing new funds to be used to match other program funds would help ensure speedier project delivery.

• **Waive all restrictions under 49 U.S.C. § 5307 on the use of funds for operating expenses for the remainder of fiscal year 2020 and fiscal year 2021.** During this period, allow federal funds to be used for 100 percent of project costs.

• Encourage the Federal Highway Administration, Federal Transit Administration, and others to **liberally grant extensions to organizations for requirements** such as long-range transportation plan (LRTP) approvals, Transportation Improvement Program (TIP), Unified Public Work Program (UPWP), FTA triennial reviews, quadrennial certifications, invoice processing, and other relevant deadlines that occur during fiscal years 2020 and 2021 and provide up to one year after the National Emergency Declaration is lifted for compliance.

• **Extend deadlines for discretionary grant programs**, including obligation deadlines, so recipients are not penalized with the loss of their grant due to an extended period of slowdown or stoppage of required work.

• **Provide flexibility to states and MPOs to update required performance targets and set new targets** as appropriate to adequately reflect the anticipated conditions. Further, **allow for or automatically grant extensions of performance target setting deadlines** as appropriate, including the MPO CMAQ Performance Plan which is currently due on October 1, 2020.

As you are undoubtedly aware, the financial impacts of COVID-19 on local governments of all sizes is acute. Many of the nation’s cities will struggle to provide the required local match for federal transportation dollars, leaving long-planned and well-vetting infrastructure projects delayed or cancelled all together. One reason it is essential to keep these projects moving is to help preserve the vital workforce that is responsible for building and maintaining the nation’s transportation infrastructure.

We look forward to working with you further to develop a final package that will help meet the transportation and infrastructure needs of all our nation’s communities. Your leadership will help ensure vital projects continue moving, help preserve the nation’s infrastructure workforce, and keep American’s working.

Sincerely,

Bill Keyrouze  
Interim Executive Director  
Association of Metropolitan Planning Organizations

Leslie Wollack  
Executive Director  
National Association of Regional Councils

Joe McKinney  
Executive Director  
National Association of Development Organizations