

MEMORANDUM

To: Arizona COGs and MPOs
From: Jason James, ADOT Planning Section Manager
Date: December 13, 2024
Re: **Companion Document to the FHWA Memorandum dated August 13, 2024, entitled: Clarified Waiver of the Non-Federal Match for State Planning and Research (SPR) and Metropolitan Planning Funds (PL) in Support of Complete Streets Planning Activities (BIL Section 11206).**

The purpose of this Memorandum expands the match waiver (100% federal share) associated with the 2.5% set aside for Complete Streets activities to now include all eligible Complete Streets activities utilizing SPR and PL (aka Metropolitan Planning Program - MPP), as well as 5305d and 5305e funds consolidated as CPG (Consolidated Planning Grant).

Eligibility¹ for MPP/CPG match waiver (per BIL Section 11206(d)) include multimodal activities and plans that:

- a) are identified in the WP/UPWP and deemed eligible by ADOT and FHWA, and
 - b) *(specific to corridor and regional plans)* address travel demand and capacity constraints to new highway capacity through multimodal analysis and multimodal project identification.
1. *Travel specific to a waiver-approved activity or plan is eligible for 100% share.*

Not eligible² (for match waiver) activities and plans:

- a) administration costs (including multimodal planner positions or other positions),
 - b) travel not associated with waiver-approved activities or plans (general travel), and
 - c) stand-alone tasks that do not directly serve a multimodal purpose. Examples include (but are not limited to):
 - Traffic Counts (HPMS)
 - Transportation Asset Management Plan³ (pavement/bridge only)
2. *If an activity/plan is ineligible for match waiver, it may still be eligible for MPP/CPG (normal match) if it meets normal MPP/CPG eligibility.*
 3. *A Multimodal Asset Management Plan (AMP) or Transit AMP would be eligible for match waiver.*

If the activity or plan is deemed eligible for MPP/CPG Complete Streets match waiver, the entire activity or plan would receive 100% federal share. If an activity or plan receives match waiver, it must complete the multimodal scope contributing to its' match waiver eligibility. Example: If a multimodal transportation plan is approved for match waiver, but due to unforeseen cost increases, the MPO requests to remove the multimodal analysis from the plan, the MPO would be required to produce normal match for the entire plan.

Match waiver applies to approved activities and plans after the date of this letter (retroactive match waiver not permitted). Upon ADOT and FHWA approval of the WP/UPWP amendment, corresponding de-obligation and re-obligation letters must be submitted to authorize such funding changes. Funding obligation letters must attach the description from the WP/UPWP element, clearly identifying eligibility.

If you have any additional questions, please contact your ADOT MPD Regional Planner.

Respectfully,

Jason James