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Date: November 14, 2019 at 9:18:14 AM MST
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Subject: [EXT] Local Government Transportation Project Fund Proposed Rule Comments

Good Morning,

Please accept these as the Mesilla Valley MPO's comments on the Local Government Transportation Project Fund Rule.

1. Mesilla Valley MPO Staff requests that specific language regarding eligibility for LGTPF to be utilized as match on federally funding projects be added to the rule. From MPO Staff's review of the text, it is implied that this is intended to be an eligible use of these funds but there should be complete clarity on this point.
2. Regarding the definition of "Public Highway," MPO Staff is concerned that this definition allows privately owned facilities to be eligible recipients of the LGTPF. Is this intended?
3. Under 18.27.6.8.C, disallowing non-cash contributions to be used for local match appears to diminish the ability of smaller jurisdictions to participate in the LGTPF.
4. Under 18.27.6.8.F, what kind of review will NMDOT perform on project applications? Will NMDOT do any evaluations on the proposals on the basis of federally required performance measures?
5. Under 18.27.6.10.B, does this item apply to jurisdictions that have grant projects that are on time, on budget, and in good standing?
6. Under 18.27.6.11.C, this item contradicts the NMDOT Planning Procedures Manual that requires MPOs to direct all correspondence to the NMDOT Planning

Liaisons. Is this intended?

7. Under 18.27.6.11.G, when would this reprogramming occur? MPO Staff requests that the timing of this reprogramming be specified.
8. Under 18.27.6.17.A, should the document retention period be specified in the grant agreement, and if so, that should be specified in the rule.

Mesilla Valley MPO Staff is especially interested in the response to Item #5. We believe clarity on this item is essential to the successful implantation of this program.

Thank you for your consideration of our comments.

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