



CENTRAL OKLAHOMA FEDERAL PRIORITIES

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ACOG SERVICE AREA MAP



ECONOMIC AND COMMUNITY DEVELOPMENT

INCREASE EDA PARTNERSHIP PLANNING FUNDING IN FY 2027 APPROPRIATIONS

For the first time in 20 years, Congress has reauthorized the US Department of Commerce Economic Development Administration (EDA). On January 4, 2025, the *Thomas R. Carper Water Resources Development Act of 2024* (Senate Bill 4367) was signed into law, following its passage in the House and Senate with overwhelming bipartisan support. Title II of the legislation, the *Economic Development Reauthorization Act of 2024*, reauthorizes the EDA. ACOG greatly appreciates your strong support for this much needed legislation.

Funding Request for EDA Partnership Planning in FY 2027

Congress should increase FY 2027 Commerce, Justice, Science, and Related Agencies appropriations funding for EDA Partnership Planning to at least **\$110 million**. This is the Congressionally authorized funding level for EDA Partnership Planning.

Economic Development Administration	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027 NADO Request
EDA Overall Appropriation	\$333 million	\$346 million	\$373.5 million	\$498 million	\$468 million	\$468 million	\$466 million	—
Total - Economic Development Assistance Programs	\$292.5 million	\$305.5 million	\$330 million	\$430 million	\$400 million	\$400 million	\$400 million	\$645 million , which is the authorized funding level for core programs
Partnership Planning	\$33 million	\$33.5 million	\$34.5 million	\$36 million	\$34.5 million	\$34.5 million	\$34.5 million	\$110 million , which is the authorized funding level for Partnership Planning

Why Are Economic Development Districts (EDDs) Like ACOG Important?

Local communities rely on EDDs, because:

- EDDs station trusted economic development professionals in local communities across the country.
- EDDs implement local projects, leverage private sector funding, broker deals with companies and industry partners, ensure the readiness of industrial sites for businesses, and help create jobs for American workers.
- EDDs support rural America, working-class communities, and economically challenged regions.
- EDDs properly administer and steward EDA funding, and they help other local EDA grantees do the same.
- EDDs help identify which local projects are of greatest importance to local workers, businesses, and families.
- EDDs are required by EDA to develop Comprehensive Economic Development Strategies (CEDS). EDDs provide local planning expertise, which lays the foundation for successful project implementation.

How Much Funding is Provided to Economic Development Districts Currently?

Partnership Planning funds provide financial support primarily for **Economic Development Districts** (EDDs). Divided among the more than 400 EDDs across the country, as well as other EDA stakeholders, the current appropriations level for Partnership Planning results in **each individual EDD receiving only \$70,000 annually**. This amount of \$70K per organization is barely enough to cover one full-time staff person. Most EDDs cover numerous counties, cities, and towns, so one staff person covering such a large region is already stretched very thin. Furthermore, in order for each EDD to receive their \$70,000 distribution, the EDD typically must provide local matching funds.

If appropriators were to provide Partnership Planning funding at the level of the authorized amount of **\$110 million for FY 2027**, this would allow each Economic Development District (EDD) to receive closer to **\$250,000 per organization annually**, which would finally allow for sufficient staffing and funding to carry out planning responsibilities that are mandated by EDA. **The current allocation is \$70,000 per EDD annually and has not been increased since 2004.**

Until recently, the appropriated funding level for the **EDA Partnership Planning** appropriations line item had **remained stagnant at \$33 million** for decades. Beginning in FY 2021, appropriators began incrementally increasing this line item, however the Partnership Planning funding level in FY 2024 fell back down to **\$34.5 million** where it has remained. Generally, the appropriation level for Partnership Planning has continued to remain nearly flat for decades, even while EDA's overall appropriation has continued to receive substantial increases over time.

Incremental Increases Too Small for EDA to Provide Funds Directly to EDD Stakeholders

The Congressionally appropriated annual increases for Partnership Planning over the past five years have been so minor that **EDA has made an administrative decision not to provide any additional planning funds** directly to EDDs. No increase in annual funding levels was provided by EDA to its local EDD stakeholders in FY 2021, FY 2022, or FY 2023, **despite the Congressionally appropriated increases** for Partnership Planning during each of those years. Funding levels also remained flat in FY2024 and FY2025 given no increases in Congressional appropriations.

Given the small nature of recent annual appropriations increases for this line item, along with the steadily growing volume of EDDs becoming designated every year and other stakeholders also vying for these resources, EDA has not provided any additional EDA Partnership Planning funding to local EDD stakeholders. For these reasons, **Congressional action is critically needed to increase EDA Partnership Planning funding in FY 2027.**

SUSTAIN OPERATIONS AND INVESTMENT IN TINKER AFB

Continue support of the U.S. Air Force's mission critical growth and expansion objectives at Tinker Air Force Base. The Base is a vital economic engine for Central Oklahoma. **This support includes necessary improvements for increased access along Douglas Blvd. and the expansion of Highway I-40 to six lanes from Douglas Blvd. to Shawnee.**

SUPPORT THE MIKE MONRONEY AERONAUTIC CENTER (FAA)/ASSOCIATED FEDERAL AGENCIES

Maintain the continued viability of the Mike Monroney Aeronautic Center (over 6,300 employees) as a strategically important national asset for the Federal Aviation Administration (FAA) and further support the continuation of its other essential federal government activities in the state. (The facility trains approximately 76,000 students each year.) Please note that **ACOG opposes any**

changes that would diminish the full utilization and viability of this facility, which provides a valuable economic impact for the region.

SUSTAIN THE GROWTH AND DEVELOPMENT OF OKC WILL ROGERS INTERNATIONAL AIRPORT

One of our major regional economic assets is OKC Will Rogers International Airport. We appreciate our congressional delegation's ongoing support for Oklahoma City's airport infrastructure projects. **Will Rogers, like most major airports, is experiencing the impact of a nationwide airline pilot and air traffic control shortage.** Your assistance in addressing this important issue both from a travel safety and efficiency perspective would be greatly appreciated.

CLOSE ONLINE SALES TAX LOOPHOLE

- Many studies and projections demonstrate that e-commerce Internet sales and other types of remote purchases (e.g., booking online travel services which impact transient occupancy taxes, rental car taxes, and business gross receipt taxes) are accelerating at a rapid pace. Thus, **uncollected, or under-collected taxes could comprise a major share of all tax collections, rendering sales and use taxes ineffective.**
- **ACOG supports passage of e-fairness legislation like the Marketplace Fairness Act (MFA, previously introduced as Senate Bill 976) and/or the Remote Transactions Parity Act (previously introduced as House of Representatives Bill 2193) that will bring our sales tax system into the 21st Century and prevent continued tax revenue losses and remove the competitive advantage now enjoyed by remote sellers.** This is a high priority issue for cities in Oklahoma as they do not receive ad valorem tax revenue, unlike municipalities in all other states, and are primarily dependent on sales tax revenue for funding operational services.

PROTECT MUNICIPAL BONDS

- **ACOG opposes any attempt to eliminate or limit the traditional tax exemption for municipal bonds, whether as a part of a deficit reduction plan, a push for comprehensive tax reform, or as an offset for new spending.**
- Tax-exempt bonds are the primary financing mechanism for state and local infrastructure projects – they have been used for more than 100 years and provide essential funding for states, counties, and localities. **Three quarters of all public infrastructure projects in the U.S. are built by states and localities, and tax-exempt bonds are the primary financing tool utilized to satisfy these infrastructure needs.** If tax exemption is eliminated or reduced, states and localities will pay more to finance projects, leading to fewer projects and fewer jobs.

SUSTAIN COMMUNITY DEVELOPMENT BLOCK GRANT FUNDING

- **The Community Development Block Grant (CDBG) Program is critical to state and local networks in providing funding for public improvements, public services, economic development, and affordable housing.** The CDBG Program provides state and local governments and their partners with the flexibility needed to develop essential programs and projects to assist low- and moderate-income families and improve their quality of life.
- **There are several specific statutory items that affect the CDBG Program that need to be addressed in addition to increased funding.**
 - Designate fair housing as a stand-alone program activity. Currently, fair housing activities can only be funded through CDBG admin or public services.

- Support increased funding for the Section 108 Loan Guarantee Program (currently funded at \$300 million).
- Raise the Davis-Bacon threshold for non-residential construction from \$2,000 to at least \$100,000 and increase the CDBG threshold to 12 CDBG assisted units to coincide with the HOME Program.
- Raise the recipient threshold for Section 3 from \$200,000 to \$750,000 and increase the Section 3 requirements to cover contracts over \$500,000.

Now is the time to continue to restore program funding. Given the continued underfunding of the program and the ongoing need at the local level, we urge Congress to appropriate at least \$3.8 billion for CDBG in FYE 2027.

- The HOME Investment Partnerships Program is a vital federal initiative that provides funding to state and local governments to support the development of affordable housing for low-income families. This block grant program helps communities create and preserve safe, decent, affordable housing by building, buying, and rehabilitating housing, as well as offering rental assistance and down payment assistance. **Preserving and increasing funding for HOME is critical because it helps ensure that vulnerable populations, including low-income renters and homeowners, have access to safe and stable housing.** Given the rising housing costs and shortages, maintaining support for this program is essential to combating homelessness, fostering economic mobility, and promoting community stability. Increased funding would also enable localities to expand housing options and respond more effectively to the housing challenges faced by many underserved communities.

It is vital that funding for this Program is preserved and increased to \$1.5 billion. In addition to increasing the budget, the priorities are:

1. Increase the allowable program administration from 10 percent to 15 percent
2. Eliminate the 24-month commitment requirement
3. Eliminate or make optional the 15 percent CHDO requirement

In addition, support increased funding for HUD's Homeless Assistance Grants: Emergency Solutions Grants (ESG) and the Continuum of Care (CoC).

HOUSING IN THE 21ST CENTURY ACT

- On February 9, the U.S. House of Representatives overwhelmingly passed the *Housing in the 21st Century Act* by a vote of 390-9. The package impacts nearly every federal housing tool used by local governments, regional development organizations, and rural communities, and for the first time, creates a new regional housing planning grant program (see below).
- Back in the fall, the Senate passed similar legislation, the *Road to Housing Act*, which was supported by the White House. With both chambers passing different proposals, they must now reconcile those differences through a conference committee or informal negotiations before voting on the negotiated proposal.
- A key provision that needs to be maintained in the reconciled bill is the new regional housing planning grants, which represents a major win for regional development organizations. If enacted, the bill establishes a new federal grant program specifically for regional housing planning.
 - Eligible Applicants: state, local, and tribal governments, and regional planning agencies
 - Eligible Activities for Regional Planning Agencies: Regional housing needs assessments, coordinating housing development with transportation planning, and the development of local or regional plans for community development.

AIR QUALITY

MAINTAIN CURRENT EPA OZONE AND PM STANDARDS

- The OKC Metro area is on the edge of going into ozone nonattainment. We request that the EPA not make the current standard more stringent (i.e., going from 70 ppb to 65 ppb for ozone and from 12 $\mu\text{g}/\text{m}^3$ to 9 $\mu\text{g}/\text{m}^3$) while supporting voluntary state and local efforts to reduce emissions.
- The recently completed ACOG Cost of Nonattainment Study shows that if our region is designated as nonattainment under the current ozone standard, the potential economic impact would be \$9.6-\$15.2 billion over a 20-30-year period.
- Along with ozone, the OKC Metro area is experiencing an increasing problem with particulate matter 2.5 (PM 2.5). **A more stringent PM 2.5 Standard would be very difficult to meet through voluntary improvement measures.**

CONTINUE IMPLEMENTATION OF THE INFRASTRUCTURE INVESTMENT AND JOBS ACT (IIJA) AND THE INFLATION REDUCTION ACT (IRA) FOR AIR QUALITY IMPROVEMENT PLANNING & IMPLEMENTATION

- **Maintain support and funding of cost-effective planning and management programs** including the EPA Climate Pollution Reduction Grant (CPRG), DOE Energy Efficiency and Conservation Block Grant (EECBG) Program, DOE Methane Emissions Reduction Program (MERP), and EPA Advance, and the FHWA Carbon Reduction Program (CRP) to meet federal goals in air quality and greenhouse gas reduction. Encourage and give credit for voluntary reductions in air pollution. With federal funding support for planning, **ACOG has adopted Central Oklahoma's first Regional Air Quality Plan which establishes implementation strategies to reduce emissions including volatile organic compounds (VOCs), oxides of nitrogen (NOx), and particulate matter. In 2024, ACOG became the OKC-MSA lead organization for EPA CPRG and adopted the region's first Climate Action Plan which establishes implementation strategies to reduce greenhouse gas and methane emissions.**

ACOG recommends the following federal policy approaches for improving regional air quality:

- Allow states, local governments, and regions to set reasonable standards and establish flexible mechanisms to achieve federal standards for air quality improvement and greenhouse gas reduction.
- Encourage the use of reasonable, market-based solutions to reduce emissions.
- Direct a portion of proceeds from any market-based program to units of local government and multijurisdictional regional organizations to support emissions reduction efforts.
- Support state, regional, and local efforts to remain in attainment and encourage EPA to recognize the role of international emissions transport, especially as it affects ozone nonattainment areas.
- Support the development and application of technologies that will reduce, capture and/or store greenhouse gases and criteria air pollutants. Continue research on the effects of greenhouse gases criteria pollutant issues.

CLEAN CITIES/ALTERNATIVE FUELS

ENSURE ADEQUATE FY 2027 FEDERAL FUNDING FOR KEY CLEAN TRANSPORTATION PROGRAMS

- For 30 years, the ACOG Clean Cities Program, designated by the Department of Energy (DOE), has contributed to the State of Oklahoma's status as an alternative fuel leader. **ACOG supports maintaining DOE Clean Cities funding at their current levels to help meet regional air quality and transportation goals.**
 - \$65 million for the DOE Clean Cities and Communities Program, including:
 - > \$20 million for local Clean Cities and Communities coalition efforts to advance alternative fuel deployment
 - > \$40 million in competitive grants to expand clean vehicle technologies
 - > \$5 million for DOE and national laboratory support
- \$100 million for the EPA Clean Diesel (DERA) Grants Program in FY 2027, to accelerate replacement of aging diesel engines in school buses, transit fleets, and freight corridors.

CONTINUE IMPLEMENTATION OF THE IIJA AND IRA LEGISLATION FOR ALTERNATIVE FUELS

- **Congress must ensure that programs authorized by these laws remain on track and fully funded to maximize their impact on Oklahoma's economy.** ACOG has been a committed partner with federal and state agencies to advance the alternative fuel opportunities included in the IIJA and IRA. Local governments, Oklahoma higher ed, Oklahoma CareerTech, **Oklahoma businesses, Tribal Nations, and many other stakeholders have invested substantial resources (including financial matching dollars) for alternative fuel infrastructure projects and domestic production of advanced vehicle technologies. Some examples include:**
 - Federal Highway Administration (FHWA) Congestion Mitigation & Air Quality (CMAQ) funding
 - FHWA Carbon Reduction Program (CRP)
 - FHWA National Electric Vehicle Infrastructure (NEVI) Program
 - FHWA Charging & Fueling Infrastructure (CFI) Program
 - DOE Energy Efficiency Community Block Grants (EECBG)
 - EPA Clean School Bus
- Oppose FHWA increasing the Build America, Buy America (BABA) domestic content requirement to 100 percent for EV charging equipment. No EV charging manufacturer can meet a 100 percent threshold, and this change would effectively end ACOG's ability to fund ongoing ACOG member fleet electrification efforts through CMAQ/CRP as well as state and local implementation of the National Electric Vehicle Infrastructure (NEVI) program

TRANSPORTATION INFRASTRUCTURE

ENDORSE FEDERAL PROGRAM FUNDING WITH STRATEGIC CHANGES

- **The apportionment of funds dedicated in the Federal Transportation Bill for surface transportation improvements in the Central Oklahoma area is not keeping up with the higher costs and the number of projects being pursued by local communities.** The demand for Surface Transportation Block Grant (STBG) funding each year exceeds \$120 million. An increase in STBG and Transportation Alternatives Program (TAP) funding for urbanized areas is greatly needed. **The Oklahoma City region receives approximately \$40 million per year. Millions of dollars' worth of critical projects go unfunded each year due to limited funding.**
- **Currently, most of the Federal STBG and TAP funding is 80/20 federal/local match.** This works for the larger communities, but smaller communities have a difficult time funding the 20 percent match. **A 90/10 federal/local match would be more helpful, especially for smaller communities.** Likewise, federal law allows certain safety projects to be constructed with 100 percent federal funds, however, regulation limits this increased federal share to 10 percent of apportioned STBG funds. **An increase in the percentage of STBG funds with this provision would allow for a greater focus on safety-oriented projects, potentially helping to mitigate the increase in injury and fatality crashes in the region.**
- **ACOG supports passage of the bipartisan Bridges and Safety Infrastructure for Community Success (BASICS) Act, introduced by Representatives Rob Bresnahan (R-Penn.-08) and Kristen McDonald Rivet (D-Mich.-08), with additional funding in the new transportation bill.** The proposed bill would:
 - increase funding for the Metropolitan Planning program to better support integrated regional planning that coordinates local efforts and spends federal funds effectively
 - strengthen flexible formula programs like the Surface Transportation Block Grant Program for local and regional project delivery
 - clarify project selection requirements to ensure that locally provided dollars are used as intended for locally identified projects, especially in rural areas
 - support rural regions by providing dedicated federal funding for Regional Transportation Planning Organizations for the first time
 - ensure regional funding for the Bridge Formula Program and Highway Safety Improvement Program to better address the needs of local communities

See Attachment I to view the five letters to our Oklahoma Senators and Representatives regarding the BASICS Act.

PROMOTE ODOT FEDERAL PRIORITIES

- Consistent and reliable federal funding – about 50 percent of Oklahoma’s transportation funding is federal. Federal authorizations and reimbursements are essential to meet Oklahoma’s transportation needs.
- Prioritize and increase formula-based funding.
- Inflationary pressures in highway construction have decreased Oklahoma’s purchasing power by more than 60 percent since 2021, resulting in fewer projects being delivered than expected. More investment is needed to meet existing demand.
- Modernize the taxes and fees for transportation to ensure fair contributions from all users of the system and ensure needed funding into the future.

- Reduce barriers and improve coordination on access to railroad rights-of-way and assets to reduce project costs and delays.
- Streamline Federal Transit Administration bureaucracy in rural transit grant administration and approval process.
- Increase the eligible federal share of transit funding to 100 percent.
- Require flexibility and assistance from USDOT on the implementation of Build America/Buy America requirements.
- Require the owner of the facility that is the subject of the grant request, to approve applications before they are submitted, including local governments' applications for projects on state-owned facilities.
- Add the existing Heartland Flyer Route from Fort Worth, Texas to Oklahoma City, Oklahoma and future northern extension to Newton, Kansas as part of the National Railroad Passenger Transportation System, to provide rural Americans access to the intercity passenger rail transportation alternatives needed to maintain national connectivity.

SECURE FUNDING FOR LA28 OLYMPIC EVENTS IN OKLAHOMA CITY

- The City of Oklahoma City has a once in a lifetime opportunity to internationally showcase the community and the State of Oklahoma by hosting two events – canoe slalom and women's softball for the LA28 Olympics. The city needs additional funding for transportation, security, and venue preparation.

INVEST IN THE I-35 CORRIDOR PROJECTS

- **Replace existing and aging I-35 bridges with iconic bridges for the purpose of showcasing Oklahoma City at the confluence of two major interstate highways and the Oklahoma River, which will facilitate increased sporting events and tourist activity.** The current bridge design is a barrier to rowing competitions being extended past the existing bridges. This would help support the success of the Olympic Training Facility on the Oklahoma River.
- ACOG appreciates funding for the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant. The project, Bridging the Gap: New Multimodal Connections over the Oklahoma River, will construct a separate bicycle and pedestrian bridge adjacent to I-35 as a component of the I-35 bridge replacement project. **The \$22 million project will link 10 interconnected trails that cover over 80 miles in Oklahoma City. This project includes connections to the new Horizons District, including the First Americans Museum, with the historically disadvantaged Capitol Hill District.**

INCREASE BRIDGE MAINTENANCE FUNDING FOR MUNICIPALITIES

- **Many municipalities and counties are currently faced with aging bridges that will not be functional in the near future.** These bridges are inspected every two years through the Oklahoma Department of Transportation (ODOT). The inspection reports show the degradation of this infrastructure.
- The Bridge Formula Program Funding part of the Infrastructure Investment and Jobs Act (IIJA) provides 100 percent funding for bridges. **This more flexible funding provides money for bridges that are not on the federal system but are too expensive for many communities to afford.** ODOT has supplemented this fund to allow more bridges to be upgraded for needed safety improvements.

See Attachment II for ACOG provided Letters of Support for multiple BUILD & Community Project Funding Requests.

MAINTAIN AND EXTEND THE AMTRAK HEARTLAND FLYER

Passenger rail service is a key component of the continued viability of the Oklahoma City intermodal hub and the future development of commuter rail throughout the Central Oklahoma region. **ACOG, along with our partners at the Greater Oklahoma City Chamber of Commerce, opposes efforts to reduce or eliminate state or federal funding received by Oklahoma to operate the Heartland Flyer Amtrak service to Fort Worth, Texas. We support continued dialogue on extending the Heartland Flyer Amtrak service to Newton, Kansas, which would connect Oklahoma City to Kansas City, St. Louis, Chicago, and other locations on the Amtrak system.** Furthermore, we support the designation of the Oklahoma City- Newton, KS line as a national Amtrak route. We appreciate the work of the Northern Flyer Alliance in supporting this campaign. This would strategically address a significant gap in the national Amtrak rail system map and assist with federal/state burden/cost-sharing to help ensure the viability of passenger rail service.

KDOT, ODOT, and TxDOT are working on the Service Development Plan (SDP) for the Newton extension thanks to a \$500,000 award from Federal Railroad Administration's (FRA) Corridor Identification and Development Program. The project will include an operational analysis, capital investment needs assessment, financial analysis, and implementation plan. ACOG would like to thank its Congressional Delegation for all its help in supporting this award.

It is recommended that our Congressional Delegation work jointly with the Kansas Delegation, specifically Congressman Ron Estes (represents Newton and Wichita), and the Texas Delegation to support this effort just as ODOT, KDOT, and TxDOT are working in partnership.

IIJA & IRA

- The Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA) contain billions of dollars in new formula and competitive funds for a wide range of transportation and infrastructure projects. **Councils of Government and Metropolitan Planning Organizations (MPO) are well positioned to use these funds to rebuild and transform the nation's transit systems, roads, bridges, and active transportation systems (walking or bicycling), and do so while accounting for community values, and the negative externalities our transportation system has created in the past.**
 - Ensure that local governments and regional planning organizations are involved in the process of planning for and distributing the available funds to the maximum extent possible.
 - Enhance the role Metropolitan Planning Organizations (MPOs) and Rural or Regional Transportation Planning Organizations (RTPOs) play to achieve increased mobility, access to opportunities, and economic prosperity, while addressing rapid shifts in innovative technology, data, and population growth.
 - Make active transportation and Complete Streets policies a priority. With the rise of all transportation fatalities and serious injuries nationwide, greater emphasis needs to be placed on addressing the deficit of safe bicycle and pedestrian facilities. Transportation projects receiving funding through the IIJA and IRA need to include active transportation components and comply with state, regional, and local Complete Streets policies to the greatest extent possible.

SUPPORT REGIONAL TRANSIT AUTHORITY (RTA) OF CENTRAL OKLAHOMA

- As highways and streets become more congested, the need for public transit is more evident. The Regional Transportation Authority (RTA) of Central Oklahoma was formally created in February 2019 and has recently been rebranded as One Transit. **Studies are currently underway, and options include commuter rail and expanded bus service in the area. Both proposals will require future funding to reach their full potential.** The cost for a commuter rail service is substantial and will be funded by One Transit member communities through local sales tax increases. However, significant federal resources, like the Federal Transit Administration's (FTA) Capital Investment Grants (CIG) New Starts program, will also be required.
- The existing bus routes in Central Oklahoma are largely subsidized through the member communities. Adding bus services would require additional funding from local communities with limited resources. Any future infrastructure stimulus proposals should consider funding for the expansion of public transit in the Oklahoma City metro area.

WATER/STORMWATER INFRASTRUCTURE & ENVIRONMENTAL ISSUES

Request for funding to offset some of the unfunded federal mandates that impact our municipalities.

WATER LINE REPLACEMENTS

A majority of ACOG communities have a water distribution system with miles of water lines, with most of these lines made of metal. Unfortunately, the clay soils in Central Oklahoma are extremely corrosive to these metal lines. **The average cost to replace a mile of line is \$750,000. Replacement of these deteriorated water lines is a major cost burden on municipalities.**

STORMWATER IMPROVEMENTS

Central Oklahoma communities will continue to face rising costs of maintenance, replacement of aging existing infrastructure, as well as the installation. **Most ACOG communities do not have a stormwater utility, therefore, they must search for outside funding sources for stormwater infrastructure. Additional federal funding support is needed.**

DROUGHT MITIGATION

With frequent periods of drought in Oklahoma, it is necessary to educate the public about proactive measures to conserve our water resources. **In addition, funding will be needed to upgrade the existing water infrastructure system and to build new water storage facilities.**

PFAS CONTAMINATION LIABILITY

The Water Systems PFAS Liability Protection Act preserves the "polluter pays" principle for cleanups of PFAS under CERCLA by shielding drinking water and wastewater systems from cleanup liability when they properly dispose of water treatment byproducts containing PFAS. Without passage of the legislation, the originators of PFAS pollution could attempt to redirect environmental cleanup costs to water systems that played no role in introducing the chemicals into the environment. In other words, it would allow those responsible for producing the chemicals to pass off cleanup liability issues to community water systems that must remove the contaminants from their source waters.

While EPA has publicly said that it intends to use its regulatory discretion to choose who to pursue

or not to pursue, the fact of the matter is that, legally, CERCLA would require EPA to pursue any polluters if land was found to contain the designated hazardous substances. If EPA ignores certain sites, it would likely in turn face lawsuits from environmental groups or even private citizen groups who would allege that the EPA is not carrying out its mandates under CERCLA.

PFAs regulations are in flux at present. On January 21, 2025, the Office of Management and Budget (OMB) withdrew the Environmental Protection Agency’s (EPA) proposed rule on Clean Water Act Effluent Limitations Guidelines (ELG) and Standards for PFAS manufacturers. This decision was part of a broader regulatory freeze mandated by an Executive Order from President Donald Trump. It is unclear at this time whether the withdrawal of the ELG rule represents a delay in implementation simply to provide the new administration time to review the proposed rule, or whether it represents the death knell for the rule, as the Trump administration seeks to deregulate.

The Water Systems PFAS Liability Protection Act enjoys the strong support of multiple organizations representing different facets of the water sector, including the American Water Works Association, the Association of Metropolitan Water Agencies, the National Association of Clean Water Agencies, the National Rural Water Association, and the Water Environment Federation. The five groups have formed an entity known as the Water Coalition Against PFAS.

WATERS OF THE UNITED STATES

ACOG supports the May 2023 U.S. Supreme Court ruling in Sackett v. EPA which clarified how the Clean Water Act’s “Waters of the United States” (WOTUS) definition applies to wetlands with no continuous surface connections to navigable waters. While the EPA’s newly proposed WOTUS definition would provide states with more control over certain waters, it would create regulatory confusion and potentially result in legal challenges. Therefore, **we oppose renewed efforts by the EPA to redefine WOTUS without congressional updates to the Clean Water Act. Broad changes to the WOTUS definition without complete legal backing pose economic, regulatory, and environmental risks which could hinder the modernization of our infrastructure, limit uses of water in energy exploration, disrupt agricultural activities, and reduce water quality through weakened protections.**

911 ACOG & OKLAHOMA

PROMOTE 911 SAVES ACT

This legislative proposal is aimed at **reclassifying 911 professionals** under the federal Standard Occupational Classification (SOC) system to recognize their work as protective service occupations rather than administrative or clerical roles. The proposed bills (S.725 and H.R. 637):

- **It has no financial cost** but affirms the skilled and emotionally demanding nature of 911 dispatchers’ work.
- **Improves data collection** to better understand the challenges and emotional toll of 911 professionals, supporting efforts to enhance their working conditions.
- **Aligns federal classification** with numerous states and localities that have already reclassified 911 professionals, ensuring consistency nationwide.
- **Includes Federal Communications Commission (FCC) reporting requirements** related to **Kari’s Law** implementation and **outage notifications**, keeping the legislation within the jurisdiction of the Senate Commerce & Transportation Committee.

This reclassification effort acknowledges the **critical role** 911 professionals play in emergency response and public safety.

For more information about ACOG and its member governments, please visit: www.acogok.org.