



May 8, 2020

The President  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500

Dear Mr. President:

I am writing today on behalf of the demolition industry to submit policy recommendations for your consideration as you work with Congress to continue the economic recovery from COVID-19. NDA represents nearly 500 U.S. and Canadian companies that offer standard demolition services as well as a full range of demolition-related services and products. NDA educates members on the latest advances in equipment and services, provides educational programs and tools to stay abreast of regulatory and safety matters and keeps regulators informed about issues in our industry. NDA also increases public awareness of the economic and societal benefits of demolition.

These recommendations are focused on short-term solutions to help demolition contractors and construction/demolition as a whole, as well as longer-term solutions that will continue the recovery in the future. Below are our recommendations:

**1. Maximizing Small Business Relief**

*Improve SBA's Paycheck Protection Program (PPP) for demolition contractors and other businesses*

Businesses around the U.S. have utilized PPP funding to sustain their businesses and retain employees during the pandemic. However, it is abundantly clear that implementation of the program has not been in sync with the intent of Congress. Namely, recent statements by the Administration have caused undue confusion, particularly on the issue of additional access to liquidity.

As such, we urge you to support the following solutions:

- Allocate an additional \$250 million for PPP loans so that all businesses have access;
- Issue clearer and more precise guidance on implementation, specifically on the question of liquidity;
- Ensure that the safe harbor window for returning PPP loans is June 5 or later;
- Issue guidance and binding regulation that clarifies that businesses who take out PPP loans under \$2 million will not face undue scrutiny or auditing provided they use funds appropriately;
- Ensure that businesses have flexibility for loan forgiveness up to three months;



- Allow businesses to select an alternative 8-week period to cover payroll expenses.

*Allow applicants to receive the maximum \$10,000 for the Economic Injury Disaster Loan (EIDL) program*

EIDL allows businesses to receive economic relief for purposes other than just payroll expenses. Guidance stated that businesses would receive an advance of \$1,000 per employee, up to \$10,000. This fails to allow small businesses to receive funding that other businesses could receive simply for having more employees. The government should advance the maximum \$10,000 to applicants within three days.

*Make the Federal Reserve's "Main Street Lending Program" accessible and effective for the demolition industry*

The Federal Reserve recently announced a program that will provide loans to businesses, states and municipalities. Under the Main Street Lending Program, small and mid-sized businesses may obtain loans from any U.S. federally insured depository, bank holding company or savings and loan holding company to maintain business operations. NDA supports a minimum loan amount to be less than \$1 million. NDA also supports considering full or partial forgiveness of loans.

*Ensure that businesses do not face continued hardship*

Businesses across the U.S. have utilized several relief programs made available by the federal government. As the COVID-19 recovery evolves, America's demolition contractors should not face undo penalties or ambiguous regulatory guidance. As such, we recommend the following:

- Prohibit PPP loan recipients from debt collection activities that negatively impact credit;
- Cut employer-paid payroll taxes through December 31, 2020;

## **2. Strengthening Construction**

*Boosting our nation's infrastructure*

The recovery from COVID-19 should include needed funding for our nation's infrastructure. As such, the federal government should enact legislation that provides immediate appropriations to programs including the Highway Trust Fund, USACE Military Construction and Civil Works Programs; and the EPA Brownfield Program, among others.

Taking action on these needed programs will help to rebuild America and provide our industry with the certainty needed to maintain and expand its workforce.

*Providing schedule adjustments*

NDA supports providing project schedule adjustments and financial compensation to contractors for losses incurred when federal, state, or local owners who utilize federal funding delay,



terminate, or limit access to projects as a result of any government directive in response to the COVID-19 outbreak.

*Improve safety in the workplace*

Demolition contractors place a serious emphasis on the health and safety of their employees. To protect demolition workers, NDA suggests:

- Boosting PPE availability for both demolition contractors and the construction industry;
- Regulatory agencies, such as OSHA, should emphasize assistance and consultations to businesses rather than emphasizing enforcement.
- Increase COVID-19 testing, specifically funding and access to tests.

NDA will continue to monitor the changing conditions and will provide additional recommendations to you as needed.

Thank you for your consideration of this important matter. Please contact NDA's Director of Government Affairs Kevin McKenney at [kmckenney@demolitionassociation.com](mailto:kmckenney@demolitionassociation.com) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lambert", is positioned above the typed name.

Jeff Lambert  
CEO

cc:

U.S. Senate  
U.S. House of Representatives