



April 17, 2023

**American  
Public Transportation  
Association**

---

**EXECUTIVE COMMITTEE**

CHAIR

Dorval R. Carter, Jr.

VICE CHAIR

Adelee Le Grand

SECRETARY-TREASURER

Jeffrey Wharton

IMMEDIATE PAST CHAIR

Jeffrey A. Nelson

Jose Bustamante

Bill Carpenter

Francis "Buddy" Coleman

Jim Derwinski

Dawn Distler

Denise Figueroa

Jannet Walker-Ford

Carolyn Gonot

Michele Wong Krause

Richard J. Leary

Henry Li

MJ Maynard

Raymond J. Melleady

Allan Pollock

Naomi Renek

Leslie S. Richards

Rita A. Scott

Doug Tisdale

Matthew O. Tucker

Thomas Waldron

Evalynn "Eve" Williams

---

**PRESIDENT AND CEO**

Paul P. Skoutelas

The Honorable Brenda Mallory  
Chair of the Council on Environmental Quality  
730 Jackson Place, NW  
Washington, D.C. 20503

Dear Chair Mallory:

On behalf of America's \$80 billion public transportation industry, which directly employs 430,000 people and supports millions of private-sector jobs, I write to strongly support the Council on Environmental Quality's (CEQ) efforts to ensure that Federal agencies fully consider the effects of Greenhouse Gas Emissions (GHG) and climate change when evaluating Federal actions under the National Environmental Policy Act (NEPA). As part of this effort, we urge CEQ to include quantifying any proposed action's total GHG emissions avoided as a part of total net GHG emissions in the final guidance for the NEPA Guidance on Consideration of Greenhouse Gas Emissions and Climate Change.

APTA strongly supports the goals of fighting climate change, protecting public health, and advancing environmental justice, and believes that our nation's public transit systems play a leading role in decarbonizing our transportation networks. Our public transit systems support the development of dense and energy-efficient land use patterns, as well as safe and healthy communities that provide economic opportunity through good-paying jobs and enhanced mobility. Maintaining safe, affordable, reliable, and efficient existing public transit services and expanding such services contribute greatly to our nation's efforts to reduce GHG emissions and address climate change.

APTA firmly supports CEQ's steps to assist Federal agencies in considering the impacts of GHG emissions and climate change when evaluating major proposed actions. Improving the efficacy and consistency of agency reviews of proposed actions is critical to harnessing the full potential of the Infrastructure Investment and Jobs Act and the Inflation Reduction Act.

1300 I Street NW  
Suite 1200 East  
Washington, DC 20005  
p: (202) 496-4800  
f: (202) 496-4324

---

**APTA.COM**

The Honorable Brenda Mallory

April 17, 2023

Page 2

According to the National Academies of Sciences, over the past 15 years, public transit agencies have consistently reduced their GHG emissions on both an overall and a per-passenger-mile basis. Today, a typical trip on public transit emits 55 percent fewer GHG emissions than driving alone. Transit agencies have been early adopters of lower-carbon vehicle technologies and zero-emission vehicles to help meet ambitious climate action plan goals. Across the country, public transit agencies are further reducing GHG emissions by integrating zero-emission vehicles into their fleets and setting goals for 100 percent zero-emission bus fleets in future years.

APTA urges CEQ, in its final guidance, to include quantifying any proposed action's total GHG emissions avoided as a part of total net GHG emissions to ensure that Federal agency calculations capture the critical role of maintaining existing public transit service to our nation's efforts to reduce GHG emissions and address climate change. To this end, APTA recommends that CEQ consider APTA's existing standard on measuring GHG emissions.

APTA is a standards-setting organization that provides guidance to public transit agencies by organizing hundreds of industry volunteers that help develop consensus-based standards for public transit agencies. In 2018, APTA issued a Recommended Practice to public transportation agencies for quantifying their GHG emissions, including emissions generated by transit and the potential reduction of emissions through efficiency and displacement.<sup>1</sup> The net GHG emissions benefit accounts for emissions avoided from reductions in vehicle miles traveled and other mode shifts, as well as emissions generated by public transit agency activities to deliver service directly.

APTA urges CEQ to apply the standard calculation that it has recommended that public transit agencies use to express net GHG emissions when measuring reduction benefits. Quantifying avoided GHG emissions would allow decision makers and the public to better compare the potential climate benefits across alternatives. Accordingly, APTA recommends the following calculation:

$$\text{Net GHG Emission Benefit} = \text{Total GHG Emissions Avoided} - \text{GHG Emissions of Service Vehicles}$$

Thank you for your consideration and attention to this matter. If you have any questions regarding this letter, please contact APTA General Counsel Linda Ford at [lford@apta.com](mailto:lford@apta.com).

Sincerely,



Paul P. Skoutelas  
President and CEO

---

<sup>1</sup> APTA Standards Development Program Recommended Practice, Quantifying Greenhouse Gas Emissions from Transit (APTA Recommended Practice) (2018).