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Public Transportation  
Association**

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February 18, 2025

U.S. Department of Transportation  
Docket Operations  
M-30, West Building Ground Floor  
Room W12-140  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

**Subject: Section 139 Efficient Environmental Reviews for Project Decisionmaking  
and One Federal Decision Interim Final Guidance**

Dear Docket Clerk,

The American Public Transportation Association (APTA) represents a \$79 billion industry that directly employs 430,000 people and supports millions of private-sector jobs. We greatly appreciate the ongoing dialogue between APTA and the Federal Transit Administration (FTA) regarding improving safety and mobility for public transportation passengers. Safety is APTA's top priority, and our industry is committed to ensuring the safety of workers, riders, and the public.

APTA looks forward to working with the Administration as it works to make the environmental review process as efficient as possible to advance projects, create jobs, and benefit families and communities.

APTA is firmly committed to ensuring efficient reviews of proposed projects, completed in a timely manner. The organization looks forward to supporting the Administration's efforts to deliver efficient, effective transportation projects. The organization offers the following comments on the Section 139 Efficient Environmental Reviews for Project Decisionmaking and One Federal Decision Interim Final Guidance.

Planning is inherently a local responsibility and is best left to local organizations. This approach will reduce the workload for Federal organizations. Pre-NEPA planning efforts should be exempt from Federal oversight.

However, if Federal agencies do provide oversight of the planning process, this effort should be documented in a memorandum of agreement between the agency and the state/local sponsor. Further, some of our agencies have had success by providing fees to cover staff costs necessary to ensure timely review and support.

The Administration might consider how the National Historic Preservation Act (NHPA) could be modified to speed project development. Many Federal agencies use NHPA compliance as a pre-cursor step to finalizing NEPA compliance. However, the State Historic Preservation Officers (SHPOs) who provide NHPA oversight and consultation are not bound by the NEPA compliance schedules. As a result, project approvals are delayed by (non-Federal) SHPOs. This might be addressed by an amendment to NHPA or by allowing (non-Federal) project sponsors to initiate NHPA compliance before NEPA compliance activities begin.

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APTA believes that rapid environmental reviews will improve our national transit network and looks forward to working with the Administration on this important goal.

If you have any questions about these comments, please contact Arthur Guzzetti, APTA Vice President – Mobility Initiatives and Public Policy, at [aguzzetti@apta.com](mailto:aguzzetti@apta.com).

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Paul P. Skoutelas". The signature is written in a cursive, flowing style.

Paul P. Skoutelas  
President and CEO