



May 12, 2015

U.S. Department of Transportation  
Docket Management Facility  
Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

**RE: Docket No. FHWA-2015-0001**

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Transit Administration's (FTA) and Federal Highway Administration's (FHWA) joint request for comments on Revised Guidance on the Environmental Review Process, published on March 13, 2015 at 80 FR 13458.

**About APTA**

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation. More than ninety percent of Americans who use public transportation are served by APTA member transit systems.

**General Comments**

APTA supports many of the proposed revisions and believes these revisions should generally help clarify the environmental review process. We suggest the Administrations specifically address the applicability of the proposed guidance; specifically, that the proposed guidance applies solely to Environmental Impact Statements (EIS).

**Coordinating/Participating Agencies**

To more fully explain the intent of Q&A 19, we recommend inserting, in the last paragraph of the answer, "However, they should consider the applicability and potential interest of those agencies relative to the proposed action and the project area to revise that list as appropriate" between the two existing sentences.

*Executive Committee*

*Chair  
Phillip A. Washington*

*Vice Chair  
Valarie J. McCall*

*Secretary-Treasurer  
Doran J. Barnes*

*Immediate Past Chair  
Peter Varga*

*Members-at-Large*

*Michael A. Allegra  
Christopher P. Boylan  
Nathaniel P. Ford Sr.  
Huelon A. Harrison  
Angela Iannuzziello  
Paul C. Jablonski  
Jeanne Krieg  
Donna P. McNamee  
Rosa Navejar  
Keith T. Parker  
Thomas F. Prendergast  
Michael A. Sanders  
Patrick J. Scully  
Carl G. Sedoryk*

*President & CEO  
Michael P. Melaniphy*

### **Preferred Alternative**

Q&A 30 should be amended to include reference to 40 CFR 1505.2 (b) regarding the environmentally preferable alternative(s), as follows: “This should include the consideration of the environmentally preferable alternative, including adequate information describing whether or not it is the preferred alternative in order to comply with the provisions of 40 CFR 1505.2 (b) that specify that this information be included in the Record of Decision.”

In Q&A 32, through 34, the draft discusses development of an alternative to a higher level of detail. The Administrations should remove this discussion or more fully explain what the phrase “higher level of detail” means, whether it is related to the concept of a higher level of design, and under what circumstances FTA might require such “higher level of detail.”

### **Coordination and Schedule**

Q&A 41 discusses the optional nature of optional schedules in FTA sponsored projects, but should be expanded to explain the circumstances under which FTA would require a project schedule.

We appreciate the opportunity to assist FTA & FHWA in this important endeavor. For additional information, please contact James LaRusch, APTA’s chief counsel and vice president corporate affairs, at (202) 496-4808 or [jlarsch@apta.com](mailto:jlarsch@apta.com).

Sincerely yours,



Michael P. Melaniphy  
President & CEO

MPM/jpl:jr