



March 10, 2020

Edward A. Boling
Associate Director for the National Environmental Policy Act
Council on Environmental Quality
730 Jackson Place, NW
Washington, D.C. 20503

Re: AMPO Response to Proposed Rulemaking – Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (Docket No. CEQ 2019-0003)

Dear Associate Director Boling:

The Association of Metropolitan Planning Organizations (AMPO) is pleased to offer the following comments in response to the Council on Environmental Quality's (CEQ) Notice of Proposed Rulemaking (NPRM) issued on January 10, 2020, regarding revisions to the implementation regulations for the procedural provisions of the National Environmental Policy Act (NEPA).

AMPO is a nonprofit, nonpartisan association representing the needs and interests of Metropolitan Planning Organizations (MPOs) nationwide. We are the national transportation advocate for metropolitan regions and are committed to enhancing the abilities of MPOs to improve metropolitan transportation systems throughout their communities. We work closely with the U.S. Department of Transportation (USDOT) to ensure that the needs of the MPO community are voiced and addressed.

AMPO supports CEQ's overall goal of expediting project delivery while protecting the environment. Given that the CEQ NEPA regulations have not been comprehensively updated in over 40 years, AMPO is supportive of updating the regulations to better align with current practices and modern technology. AMPO acknowledges that the environmental review process has grown increasingly complicated and recognizes that updating the current regulations could lead to better and more efficient decision-making. However, it is critical that any such updates do not compromise the environment.

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AMPO and the American Association of State Highway and Transportation Officials (AASHTO) work closely together as our collective members serve as the stewards of the nation's surface transportation system. AMPO supports the comments and concerns provided by AASHTO in its comment letter to the CEQ dated March 4, 2020. AMPO submits the AASHTO comments as part of its letter.

AMPO appreciates the opportunity to provide comments on the CEQ's proposed changes to NEPA regulations. If you have any questions or would like to further discuss AMPO's comments, please contact Bill Keyrouze, AMPO Interim Executive Director, at 202-624-3680.

Sincerely,

A handwritten signature in black ink that reads "William T. Keyrouze". The signature is written in a cursive, flowing style.

Bill Keyrouze
Interim Executive Director
Association of Metropolitan Planning Organizations

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