

March 4, 2020

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

Re: Extension of Commenting Period for Docket No. CEQ 2019-0003

Dear Associate Director Boling:

The American Association of State Highway and Transportation Officials (AASHTO) is requesting that the Council on Environmental Quality (CEQ) extend the comment period for the Notice of Proposed Rulemaking (NPRM) issued January 10, 2020 regarding revisions to the implementing regulations for the procedural provisions of the National Environmental Policy Act (NEPA) (Docket Number CEQ 2019-0003) until May 10, 2020 (60 days beyond the 120 days provided in the docket). This extended period would provide the State Departments of Transportation (State DOTs) with adequate time to provide the CEQ with a substantive feedback that will serve as valuable input to the rulemaking process.

AASHTO has been collaborating with our member departments to discuss comments for this notice of proposed rulemakings (NPRM). After initial discussions with our State DOT members, it became apparent that the scope and complexity of this NPRM far exceeds the breadth and depth of other NPRMs and will require a more extensive review by the State DOTs to provide the CEQ with comprehensive and robust input.

AASHTO is requesting that the CEQ provide an additional 60 days of commenting time with a revised closing date of May 10, 2020. We believe that this additional time will enable the State DOTs and AASHTO to provide the CEQ with more comprehensive and substantive comments, ultimately leading to an enhanced rulemaking outcome.

We appreciate your consideration in this matter. If you would like to discuss this issue any further, please contact Shannon Eggleston, AASHTO's Program Director for Environment at (202) 491-7462.

Sincerely,



Jim Tymon
Executive Director, American Association of State Highway and Transportation Officials