



Executive Director
Ryan Russo

BOARD OF DIRECTORS

President
Michael Carroll, P.E.
Deputy Managing Director,
Philadelphia Office of Transportation
and Infrastructure Systems

Vice President
Laura Rubio-Cornejas
General Manager, Los Angeles
Department of Transportation

Treasurer
Millicent D. Williams
Director, Portland Bureau
of Transportation

Secretary
Kelly Scocco
Director, Columbus
Department of Public Service

Affiliate Member Representative
Brad Rawson
Director of Mobility, Somerville
Mayor's Office of Strategic Planning
and Community Development

Chair
Janette Sadik-Khan
Principal, Bloomberg Associates

March 27, 2025

Ms. Katherine Scarlett, Acting Chair
Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20503

SUBJECT: Comments on Interim Final Rule for Removal of National Environmental Policy Act Implementing Regulations, [Docket No. CEQ-2025-0002]

Dear Ms. Scarlett,

On behalf of the National Association of City Transportation Officials (NACTO), I am commenting in response to the Council on Environmental Quality's (CEQ) Interim Final Rule (IFR) for Removal of National Environmental Policy Act Implementing Regulations [Docket No. CEQ-2025-0002].

Our [member cities and transit agencies](#) across the U.S. have real-world experience delivering infrastructure projects for their communities and working within existing federal and state environmental review processes.

NACTO opposes the Council on Environmental Quality's (CEQ's) Interim Final Rule, revoking all versions of CEQ's National Environmental Policy Act (NEPA) implementing regulations. These regulations have provided regulatory certainty to over 80 federal agencies, and the Interim Final Rule will create unnecessary delays and added complications as our members seek to deliver critical infrastructure projects for their communities.

NACTO and our members support revising the NEPA process. We want to work with the administration to streamline projects that require multiple agency reviews and to create a list of categorical exclusions for projects in existing public rights of way. However, the rescission of CEQ's regulations does little to help. Instead, it forces our member agencies to rely on a patchwork of agency-specific NEPA interpretations, leading to unnecessary confusion, delay, and litigation regarding the development of federally funded transportation projects.

This new uncertainty and potential for significant delays will halt and reverse recent progress to decrease permitting timelines. Just last month, CEQ reported that timelines were significantly shorter than just a few years ago. With clear regulations from CEQ that included direction to agencies regarding their long-standing responsibility to assess climate and environmental justice effects and increased funding from Congress, agencies could complete more NEPA reviews and did so significantly faster.

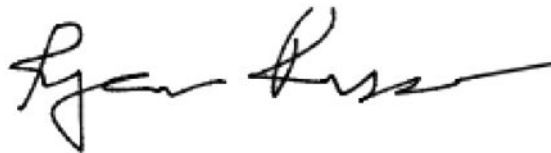
Many of our member agencies have already started to experience direct confusion and delays in NEPA reviews with various projects funded by the Infrastructure Investment and Jobs Act. Staff from state DOTs, the Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA) have reported being uncertain of the timing and impacts of any new NEPA regulations that the U.S. DOT must coordinate.

The Interim Final Rule will drive up costs and erode public trust. New processes requiring environmental assessments and environmental impact statements through FHWA and FTA headquarters are delaying the construction of critical infrastructure projects. The delays will ensure that projects become increasingly expensive, going against the needs of everyday American taxpayers.

An efficient process benefits everyone. **CEQ must ensure that federal agencies maintain a coordinated, streamlined regulatory review process** and not create unnecessary uncertainty and delay for local governments.

NACTO and our members look forward to engaging in conversations with CEQ and the U.S. DOT to ensure that future NEPA reviews and federal agency processes represent the needs of cities in constructing infrastructure projects for their communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Russo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan Russo
Executive Director
National Association of City Transportation Officials