

September 14, 2012

Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503
Attn: DOT Desk Officer

Re: Agency Information Collection Activities: Request for Comments for a New Information Collection, Docket No: FHWA-2012-0083, USDOT Survey of the Use of Categorical Exclusions in Transportation Projects since 2005

On behalf of the 5,000 members of the American Road and Transportation Builders Association (ARTBA), I respectfully offer comments on the proposed information collection to be conducted by the United States Department of Transportation's (DOT) regarding the use of categorical exclusions (CEs) in transportation projects since 2005.

ARTBA's membership includes public agencies and private firms and organizations that own, plan, design, supply and construct transportation projects throughout the country. Our industry generates more than \$380 billion annually in U.S. economic activity and sustains more than 3.3 million American jobs.

Because of the nature of their businesses, ARTBA members undertake a variety of activities that are subject to the environmental review and approval process. ARTBA's public sector members adopt, approve, or fund transportation plans, programs, or projects which are all subject to multiple federal regulatory requirements. ARTBA's private sector members plan, design, construct and provide supplies for these federal transportation improvement projects. This document represents the collective views of our 5,000 member companies and organizations.

ARTBA supports DOT's proposal to collect information on how CEs are currently being used in the delivery of transportation improvements. Collecting this information is an essential first step in implementing the provisions of the "Moving Ahead for Progress in the 21st Century" (MAP-21) Act that expand the use of CEs in transportation project review and approval.

MAP-21's goal of increasing the use of CEs is one which will greatly help to reduce delay in the current review and approval process for transportation improvements. In gathering information about existing CEs, DOT should strive to compile as broad of a range of CEs as possible. The more CEs that are identified by DOT, the greater the opportunity will be to reduce delay. Also, in cases where CEs have not been successful, attention should be paid to what needs to be done in order to make them work.



ARTBA looks forward to continuing a dialogue with DOT in order to continue the implementation of MAP-21 and improve the project delivery process for transportation improvements.

Sincerely,

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

T. Peter Ruane
President & C.E.O