Comment from Senior Fellow Alan B. Morrison on *Clarifying Statutory Access to Judicial Review of Agency Action*May 19, 2021

I have read the final version and I have totally non-substantive comments.

First, the footnotes in the first two sentences seem oddly placed. The first note, which is tied to "numerous statutes" does not cite or discuss statutes, but refers to common law doctrines. I would move to the end of the first sentence or, better yet, put the thought in the text, and only the cite in a footnote, but that reflects my preference for text over footnotes. Then I would put the APA cite where you first mention the APA, instead of having the first cite to a statute being only the second mentioned Hobbs Act.

Alan