

November 22, 2019

Mary B. Neumayr

Chair of the Council on Environmental Quality (CEQ)

730 Jackson Place NW

Washington, DC 20506

Dear Chair Neumayr,

We urge CEQ to issue updates to the National Environmental Policy Act (NEPA) implementing regulations to modernize the Federal environmental review and permitting process with the goal of increasing infrastructure investment and project development in a manner that strengthens our economy and enhances environmental stewardship.

Our organizations represent broad sectors such as agriculture, energy, forestry, manufacturing, and transportation that form the backbone of America's industrial economy, and we fully support the fundamental goals of NEPA to appropriately consider the potential environmental impacts of certain federal actions. However, CEQ regulations guiding NEPA processes have not been comprehensively updated in nearly four decades. During this time, securing approval for projects and land management decisions has become hampered by unreasonable costs and long project delays. It is time to modernize NEPA processes.

Reducing delays and uncertainties associated with infrastructure investment and related projects has the potential to support more and better-paying jobs throughout the country. Various private and public organizations estimate the creation of up to 13,000 jobs for every \$1 billion spent on infrastructure. America's infrastructure and natural resources — from roads, bridges, airports, railways, airways and waterways to energy and industrial facilities, telecommunications networks, and other public assets — are vital to economic activity, investment, trade, and commerce both domestically and abroad. Recent economic growth has only increased the demand for such infrastructure services and maintenance.

Revisions to the NEPA review process should aim to increase transparency and predictability as well as coordination between federal agencies to eliminate unnecessary barriers that prevent or delay the implementation of important projects. Improved regulatory predictability would allow businesses to

plan and invest with confidence while enhancing economic productivity and efficiency. Such process improvements would also encourage many states and localities to follow federal leadership on approving infrastructure projects and land management activities.

NEPA provides important safeguards to ensure that major federal actions and approvals carefully consider environmental impacts. We believe however, the scope of NEPA analysis should be focused on information specifically related or consequential to the federal action at hand, as opposed to an overly broad and exhaustive analysis of all issues, without regard to significance.

In addition, NEPA review times should be shortened. The time needed to complete an environmental impact statement has become progressively longer, now taking almost six years to complete on average. Such delays affect important business decisions and economic growth that can prevent or delay the maintenance, rebuilding, and expanding of infrastructure, and can be an unnecessary drain on the economy while forestalling the economic benefits these projects often provide.

For these reasons, we urge CEQ to expeditiously proceed with revisions to modernize NEPA implementing regulations and ensure a more efficient, predictable, and effective approach to environmental permitting of infrastructure and development projects.

Sincerely,

Airlines for America
American Chemistry Council
American Coke and Coal Chemicals Institute
American Council of Engineering Companies
American Farm Bureau Federation
American Fuel & Petrochemical Manufacturers
American Forest & Paper Association
American Gas Association
American Highway Users Alliance
American Iron and Steel Institute
American Petroleum Institute
American Public Power Association
American Road & Transportation Builders Association
American Trucking Association
Associated Builders and Contractors
Associated General Contractors of America
Association of American Railroads
Association of Oil Pipe Lines
Edison Electric Institute
Federal Forest Resource Coalition
Independent Petroleum Association of America
International Liquid Terminals Association
National Asphalt Pavement Association
National Association of Home Builders
National Association of Manufacturers
National Association of Realtors
National Lime Association
National Mining Association
National Rural Electric Cooperative Association
Portland Cement Association
The Fertilizer Institute
The National Stone, Sand, & Gravel Association
Treated Wood Council
U.S. Chamber of Commerce