

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 Cooperatives Association  
Portland Cement Association  
The Fertilizer Institute  
The National Stone, Sand, & Gravel Association  
Treated Wood Council  
U.S. Chamber of Commerce