



**Energy Equipment and Infrastructure Alliance
Statement to the Council on Environmental Quality on
Proposed Revisions to NEPA Implementing Regulations**

Docket CEQ-2019-0003; February 25, 2020

I am Toby Mack, President of the Energy Equipment and Infrastructure Alliance. EEIA represents companies and workers who supply construction, equipment, materials and services essential to building the physical infrastructure that produces, transports and delivers reliable, abundant and affordable energy to American consumers, businesses and industry.

Our members hail from over 60 different industries and trades operating throughout all 50 states. The infrastructure they build provides the essential physical platforms that now power American energy independence, enhanced national security, increased global manufacturing competitiveness, countless new jobs, historically low consumer and industry energy costs; and all this while American greenhouse gas emissions are declining faster than anywhere else in the world.

We strongly support the fundamental goals of the National Environmental Policy Act to carefully consider environmental impacts when federal agencies evaluate and decide whether to sanction infrastructure under their jurisdiction. But the processes for making those decisions have over time become unnecessarily cumbersome, long and expensive without advancing the end goal of ensuring that the potential environmental impacts of projects are known and considered when deciding if they conform to national environmental policy.

The result is higher costs, fewer jobs, impaired returns on investment, and less of the essential infrastructure needed to support American economic growth, higher wages and standards of living.

In the absence of clear guidelines for timeliness and scope, agency NEPA reviews have grown into time-consuming, exhaustive analyses of often inconsequential or insignificant issues having little impact on the environment.

The resulting uncertainties in the permitting process have added unnecessary risks and otherwise burdened investments in essential infrastructure without adding any environmental benefits. As a result, projects are delayed or cancelled, jobs are lost and investments in construction, equipment and materials are either stranded or not made.

We urge the Council on Environmental Quality to move forward with its proposed revisions that will implement a more effective, efficient, timely and predictable process for environmental review and permitting of infrastructure essential to American jobs and prosperity, while keeping essential environmental protections in place.

Thank you for the opportunity to present our views on this critically important rulemaking.