

# American Conservation Coalition Action

July 21, 2025

The Honorable Bruce Westerman  
Chairman, Committee on Natural Resources  
U.S. House of Representatives  
1324 Longworth House Office Building  
Washington, D.C. 20515

Dear Chairman Westerman,

On behalf of American Conservation Coalition Action (ACC Action), and our thousands of young leaders across the country, I am reaching out to thank you for your leadership in bringing the critical issue of permitting reform to light. It's no secret that the current permitting system is holding us back from building America's energy future.

While many environmental statutes cause unnecessary delays, the National Environmental Policy Act (NEPA) is at the root of many of the most significant issues. Though well-intentioned, this law should be reassessed to determine whether NEPA is working as intended. Environmental impact statements take an average of four years to approve. Geothermal projects face development timelines of 7 to 10 years. Transmission lines commonly face timelines of a decade or more. Most unfortunately, the U.S. has the world's second-longest mine development time at 29 years. Meanwhile, performative activists have weaponized NEPA through litigation to delay or derail projects. Agencies win 80% of appeals cases, so frivolous lawsuits often delay projects with little to no environmental or public benefit. It's time for our environmental permitting system to meet the moment—right now, it's preventing us from building the clean, reliable, and affordable energy future we need.

ACC Action supports the following reforms to NEPA and judicial review to ensure that our permitting system will let America build and secure America's energy future:

- Limit standing under NEPA to individuals who are directly and nascently affected and who participated in public comment, and restrict litigation to issues raised during the public comment process.
- Cap injunctive relief timelines (e.g., 4 years from the Notice of Intent or 6 months from the Record of Decision), add Loper waiver language to the NEPA statute preserve agency deference in interpretation, shorten the statute of limitations, and set deadlines for agency remands.
- Limit Environmental Assessments (EAs) to issues not already addressed by states or other public entities and implement deadlines on agency decisions for both EAs and EISs with

# American Conservation Coalition Action

default preliminary approval (e.g., Finding of No Significant Impact) if deadlines are missed.

- Make clear that the mere presence of federal funding, such as grants, loans, or loan guarantees, does not automatically constitute a “major federal action” that triggers NEPA review.
- Establish categorical exclusions for low-disturbance, well-understood activities such as grid-enhancing technologies and geothermal exploration drilling.

Additionally, any permitting reform package must include a compromise on linear infrastructure parity to advance transmission reform. As electricity demand surges—driven in part by the AI race with China—we must be able to expand our grid accordingly. Granting the Federal Energy Regulatory Commission (FERC) consolidated siting authority for interstate transmission, similar to its role for pipelines, would be a meaningful step forward. Reforms to NEPA and judicial review, as outlined above, will also help ensure these projects are developed on more efficient timelines.

America’s energy future requires a permitting system built for the challenges we face today. Thank you for your leadership on this critical issue. We look forward to working with you and the Committee to deliver much-needed permitting reform during the 119th Congress.

Sincerely,  
Andrew Mills



Managing Director, ACC Action