



July 31, 2025

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

RE: Support Letter for the Standardizing Permitting and Expediting Economic Development or (SPEED) Act

Dear Chairman Westerman and Members of the Committee:

On behalf of the Arizona Rock Products Association (ARPA) and the Arizona Mining Association (AMA) I am writing to express our strong support for the Standardizing Permitting and Expediting Economic Development (SPEED) Act. We commend your leadership and commitment to restoring the National Environmental Policy Act (NEPA) to its original procedural purpose while modernizing its implementation to meet the demands of today's infrastructure, energy, and economic development needs.

The Arizona Rock Products Association (ARPA) is the oldest mining related trade organization in Arizona and for 68 years has been providing representation for 60 member companies involved with the production of aggregates, asphaltic concrete, ready mix concrete, asphalt, lime products, and portland cement used in nearly every private and public construction project in Arizona. Arizona's aggregate mining industry employs approximately 8,656 people directly and 16,691 indirectly for a total of 25,347 has an estimated direct and indirect impact on the Arizona economy of \$7.6 billion. Our producer members are combined with over 80 associate members that provide related transportation, contracting, mining supplies and consulting services.

The AMA is a non-profit corporation comprised of entities engaged in mining and mineral processing in Arizona. In 2024, AMA member companies produced approximately 74% of the nation's newly mined copper, along with significant amounts of associated valuable co-

products (e.g., gold, silver, selenium, tellurium and molybdenum). Arizona's hard rock mining industry employs approximately 14,580 people directly which supported an additional 44,339 indirectly and has an estimated direct and indirect impact on the Arizona economy of nearly \$21.1 billion. The AMA is the unified voice of responsible, sustainable and safe mining in Arizona. Through our advocacy, we help Arizona continue to be a premier location for mining investment in the U.S.

For decades, NEPA's process has become increasingly burdened by ambiguity, duplication, and litigation that has delayed and derailed critical projects across the country. The SPEED Act addresses these long-standing challenges with clarity and common sense. By explicitly reaffirming that NEPA is a procedural statute, not a mandate for specific outcomes, the legislation helps ensure that environmental reviews remain focused and free from undue political interference. Importantly, the bill prevents federal agencies from withdrawing environmental documents in the absence of a court order, bringing a measure of certainty and integrity back into the permitting process.

The SPEED Act also promotes efficiency by recognizing the equivalency of other federal and state environmental reviews, thereby preventing costly and unnecessary duplication. This is especially significant in states like Arizona, where well-established environmental review processes can and should be recognized as meeting NEPA standards. Furthermore, the Act sets clear and enforceable timelines for agency reviews, two years for Environmental Impact Statements and one year for Environmental Assessments with any extension requiring approval from the project sponsor. This reform introduces long-overdue predictability and accountability into federal permitting, helping to prevent project stagnation and runaway costs. This is especially important to Arizona, a top producer of critical and strategic minerals.

Another key strength of the SPEED Act is its requirement that environmental reviews focus solely on impacts that are proximately caused by the proposed project. This clarification will prevent reviews from being bogged down by speculative, tangential, or unrelated factors, thereby reducing document length, enhancing public participation, and limiting litigation risks. It also reinforces that scientific input must be relevant within the jurisdiction of the cooperating agency, enabling better-informed decisions without opening the door to manipulation or delay.

The legislation's judicial review provisions are equally critical. By establishing a standard that agency actions may only be invalidated upon a finding of substantial abuse of discretion, and by limiting court remedies to remand rather than vacatur it reinforces the role of expert agencies in environmental review and prevents courts from imposing their own judgment in place of qualified agencies. The bill's time limits for filing claims and its standing requirements for commenters further protect against litigation abuse, ensuring that only those with a genuine and substantive stake in a project may bring suit.

In addition, we support the bill's efforts to allow programmatic environmental documents to be used for up to ten years and to share categorical exclusions across agencies. These provisions increase consistency, reduce redundancy, and make better use of limited agency resources. Similarly, clarifying that grants and subsequent approvals do not automatically trigger new NEPA reviews helps focus attention on actions with genuine federal involvement. Finally, we are pleased to see the inclusion of precedent from the Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County*, which appropriately limits judicial second-guessing of agency judgments.

In conclusion, the SPEED Act delivers essential reforms to the NEPA process that protects environmental integrity while eliminating unnecessary bureaucratic hurdles and frivolous litigation. It creates a framework that respects both environmental stewardship and economic development by ensuring timely, transparent, and science-based decision-making. We urge the Committee to advance this legislation without delay and thank you for your dedication to modernizing the nation's permitting system in a manner that benefits communities, industry, and the environment.

Sincerely,

A handwritten signature in black ink that reads "Steve Trussell". The signature is written in a cursive, flowing style with a large initial "S".

Steve Trussell
Executive Director
Arizona Rock Products Association