



COLORADO CONSERVATION ALLIANCE

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July 30, 2025

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

RE: The Standardizing Permitting and Expediting Economic Development Act, or SPEED Act (Reps. Westerman and Golden) to Amend the National Environmental Policy Act of 1969 (NEPA) to address statutory flaws that have resulted in lengthy timelines and increased frivolous litigation.

Honorable Chairman Westerman,

As Chairman of the Colorado Conservation Alliance (the Alliance) I write in strong support of the *Standardizing Permitting and Expediting Economic Development Act* (SPEED Act) improvements to the National Environmental Policy Act (NEPA) review process. The quick action taken by sponsors of this proposed amendment following the U.S. Supreme Court's ruling in the *Seven County Infrastructure Coalition v. Eagle County, Colorado* case is commendable. Additionally, and speaking also as owner of an energy company with over 40 years of operation and offices in four states, I support the SPEED Act's needed tightening of scope and clarification on conditions for NEPA review.

Energy producers, especially in the State of Colorado, have been unfairly burdened with NEPA's uneven application across federal agencies and shifting regulatory interpretations by which permits are too easily denied or delayed. For example, anti-energy activists in Colorado engaged in lawfare for over 20 years to delay drilling permits and are now suing the Bureau of Land Management for failing to achieve production on those same federal mineral leases. Energy operators in anti-energy states like Colorado have faced high litigation risk under NEPA, and without reforms such as the SPEED Act the government's willingness to expand federal leasing opportunities will not achieve the benefits intended.

If passed, the SPEED Act will help remove NEPA's ambiguity; and when combined with discreet evaluation and when appropriate correction or revocation of federal to state agency cooperative agreements, the SPEED Act will also help restore confidence needed for future investments in American energy which are vital to economic growth and national security.

Importantly, the SPEED Act's proposed revisions will also help expedite NEPA reviews which are essential to conservation and protection of the environment, including endangered species protections, which are areas of concern for the Alliance. Amendments like the SPEED Act are needed because, as the Seven County SCOTUS ruling highlighted, lawfare has been detrimentally inserted into the NEPA review process. NEPA related lawfare has delayed projects to the point of rendering them uneconomic and has established judicial precedent that has eroded congressional intent. And nowhere is such judicial and activist group manipulation of NEPA more evident than in Colorado's Proposition 114 Gray Wolf "reintroduction."

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In Colorado activist organizations flipped their script from demanding NEPA reviews as a tool to obstruct energy operations, to an unexpected legal position that Colorado's Prop 114 "reintroduction" of Gray Wolves didn't trigger NEPA. The activists, Colorado state officials under Governor Jared Polis, and the U.S. Fish & Wildlife Service under the Biden administration unreasonably asserted a NEPA outcome was prior determined by Colorado's voters who narrowly passed Prop 114 in November of 2020 according to Colorado's Secretary of State Jenna Griswold. Based on this predetermined outcome the USFWS skipped NEPA review and helped import non-native non-resident wolves to the Western Slope of Colorado which is predominantly federal land and notably contains the world's second largest reserve of natural gas.

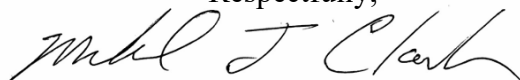
Absent a public review and impact assessment under NEPA prior to Colorado's wolf "reintroduction" action, there was also no venue to require Resource Management Plan updates based on the known (planned) influx of a dangerous predator and endangered species. Without some commonsense guardrails such as the SPEED Act, Colorado's energy operators remain at risk of full operational shutdown if a Prop 114 wolf wanders onto their federal drilling site. This risk devalues federal mineral leases contrary to President Trump's Executive Orders and contrary to the Department of the Interior's stated budget plans.

The SPEED Act's Section 3 "Judicial Reform" provisions are long overdue. They also effectively shine a spotlight on the glaring impropriety of the U.S. Fish & Wildlife Services conduct under the Biden administration to evade NEPA review and focus solely on post-reintroduction management of Colorado's Prop 114 artificially inflated population of wolves.

As described by this committee, the SPEED Act codifies NEPA-related elements of the Supreme Court's recent and unanimous ruling in the Seven County case. In the unanimous opinion Judge Kavanaugh stated that NEPA is intended to "inform agency decision-making and not paralyze it." However, in the case of Colorado's Gray Wolves USFWS amputated their NEPA review entirely, and an apparent activist judge appointed by former President Obama handed USFWS the bone saw. Given the disconnect between the Biden administration's USFWS actions and the now clarified congressional intent of NEPA, I encourage current U.S. Fish and Wildlife Service officials and Department of Interior leadership to review USFWS's past actions connected to Colorado's Prop 114 wolves, and I encourage continued congressional attention to NEPA and ESA reform.

The SPEED Act's potential to restrict future abuse of the NEPA review process is encouraging. The Supreme Court has spoken, Congress is in process of taking meaningful action, and the USFWS under the Trump administration should take note and should not continue to pretend Colorado's voters had authority to make a "Ballot Box Biology" decision regarding this federal ESA listed apex predator's preservation or Colorado's forced occupation of Gray Wolves on federal lands.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael J. Clark". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Clark".

Michael J. Clark

*Chairman, Colorado Conservation Alliance
CEO, Petrox Resources, Inc.*