



October 27, 2025

The Honorable Bruce Westerman
Chairman
Committee on Natural Resources
Washington, DC 20515

The Honorable Jared Huffman
Ranking Member
Committee on Natural Resources
Washington, DC 20515

Dear Chairman Westerman and Ranking Member Huffman:

The American Gas Association (AGA) is pleased to strongly support the *Standardizing Permitting and Expediting Economic Development* (SPEED) Act (H.R. 4776), bipartisan legislation that provides much needed clarity and certainty to the National Environmental Policy Act (NEPA) and will help facilitate a more efficient, effective, and predictable environmental review process.

AGA, founded in 1918, represents more than 200 local energy companies that deliver natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 96 percent – more than 74 million customers – receive their gas from AGA members. AGA advocates for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one-third of the U.S.' energy needs. Natural gas pipelines are an essential part of the nation's energy infrastructure. Indeed, natural gas is delivered to utility customers through a safe, approximately 2.7-million-mile underground pipeline system, including 2.3 million miles of local utility distribution pipelines, 100,000 miles of gathering lines, and 300,000 miles of transmission pipelines providing service to more than 189 million Americans.

The SPEED Act provides federal agencies, project proponents, and other stakeholders increased clarity and certainty by reaffirming that NEPA is a purely procedural statute designed to ensure thoughtful environmental review without dictating particular policy outcomes. This clarification will help prevent the abuse of the environmental review process to require specific environmental outcomes and delay the construction and deployment of critical infrastructure, including pipelines. Equally important, the legislation adds language to the NEPA statute allowing reliance on environmental reviews conducted pursuant to other federal and state statutes that are determined to meet the requirements of NEPA, helping to prevent duplicative and redundant reviews at both the federal and state level. Moreover, this legislation takes additional steps to ensure timely and unified federal reviews by clarifying the role and responsibilities of cooperating agencies, reducing unnecessary delays and better ensuring predictability for all stakeholders. This increased efficiency will help natural gas utilities plan infrastructure investments more accurately and efficiently and will help deliver energy more safely, reliably, and cost-effectively to residential, commercial, and industrial customers across the country.

This bill also helps eliminate unnecessarily protracted environmental reviews by clarifying that agencies should only analyze effects that share a reasonably close causal relationship to, and

are proximately caused by, the immediate project under consideration. Additionally, this legislation provides much needed clarity to the term “reasonably foreseeable” and affirms that effects that are speculative or separate in place and time need not be included in environmental reviews. While the Supreme Court’s recent decision in *Seven County Infrastructure Coalition vs. Eagle County Colorado*¹ helped to clarify the appropriate scope of NEPA reviews, Congress should take appropriate steps to codify the Court’s core holdings in statute for consistency across agencies. Statutory changes – like those included in the SPEED Act - would provide the long-term regulatory certainty, predictability, and durability needed for natural gas infrastructure investment.

Finally, the SPEED Act takes meaningful steps to improve judicial review. Requiring that lawsuits be filed within 150 days and grounded in substantive, timely public comments ensures that genuine concerns are raised early in the process and help reduce frivolous litigation. Furthermore, the expedited 180-day timeline for courts to resolve cases will bring greater certainty for agencies, infrastructure project sponsors, utilities, and communities alike while maintaining fulsome opportunities for public participation. Overall, the legislation provides much needed clarity regarding the standard of review employed in NEPA lawsuits and codifies the Supreme Court’s holding in *Seven Counties* that courts may not substitute their own judgement for that of the agency regarding the environmental effects considered in the environmental review process.

Taken together, these reforms represent a balanced modernization of NEPA—one that upholds transparency and environmental protection while reducing unnecessary delay and cost. Modernizing federal permitting is essential to operating and improving the pipeline infrastructure needed to meet America’s goals for energy abundance, reliability, and affordability. These improvements will help natural gas utilities continue to expand and deliver safe, dependable, and affordable energy to homes, businesses, and critical infrastructure facilities nationwide.

AGA appreciates your leadership on common sense permitting reform and looks forward to working with the Committee to advance the SPEED Act into law.

Respectfully,



George Lowe
Vice President, Government Affairs and Public Policy
American Gas Association

¹ See *Seven County Infrastructure Coalition, et al. v. Eagle County Colorado, et al.*, No. 23-975 (May 29, 2025) (emphasizing that “NEPA is a procedural cross-check, not a substantive roadblock” and reaffirming that the goal of NEPA is to inform agency decisionmaking, not paralyze it”).