

April 6, 2021

The Honorable Deb Haaland  
Secretary of the Interior  
Washington, D.C. 20001

Dear Secretary Haaland:

On behalf of the 400 members of the National Stone, Sand & Gravel Association, we congratulate you on your confirmation to become Secretary of the Interior. As you work to advance the mission of the Department of Interior, I wanted to take this opportunity to share our views on issues aggregates operators are confronting as we work to build America's infrastructure.

NSSGA represents aggregates producers and those who manufacture equipment and services that support the construction industry. Our members are essential to the work of this country, and we represent more than 90 percent of the crushed stone and 70 percent of the sand and gravel consumed annually in the United States. Our members employ more than 100,000 hard-working men and women who are responsible for the essential raw materials found in every home, building, road, bridge, and public works project.

NSSGA members have a steadfast commitment to conservation in both their business practices and personal lives. Aggregates operators have advanced award-winning environmental stewardship projects to build critical habitats, promote biodiversity and drive greater access to recreational activities. As most NSSGA member quarries and plants have served as the bedrock of their communities for decades, they take great pride in engagement and are active in giving back to their local communities.

We strongly agree with the commitments you made during the confirmation process to bipartisanship and the need to work across the aisle to find the bipartisan solutions needed to address the many issues impacting our nation. NSSGA looks forward to being a partner in this dialogue as you work on the following issues:

### **America's Energy Future**

NSSGA members, including industrial sand producers, are proud to supply the materials necessary for producing and delivering all forms of energy to every community. Our nation's energy independence, which is essential to economic growth and national security, could not be obtained without the products NSSGA members mine, process, or manufacture.

We are concerned with the impact of moratoriums and delays surrounding the ability to obtain new oil and gas leases and urge the Department to continue its critical function to allow for the responsible production of oil and gas on federal lands. In 2019, production from federal lands accounted for 24 percent of oil and 12 percent of natural gas produced in the U.S.

This also extends to the infrastructure needed to transport and deliver energy to American homes, schools, and businesses. NSSGA is opposed to new requirements and delays that unnecessarily prohibit the development of responsible new infrastructure, like pipelines, rail, processing and refining facilities and other energy critical infrastructure that is essential to the

livelihoods of all Americans. We strongly support your commitment to advance transition to a cleaner energy future must come through innovation, not elimination.

### **Endangered Species Act**

NSSGA is supportive of legislative and Administration efforts to modernize the Endangered Species Act (ESA) to focus on species recovery, encourage voluntary efforts, and balance the interests of landowners and local governments and stakeholders.

Our members are often multigenerational family-owned businesses. They live in the areas of their operations, so a safe and healthy environment for all species is important. The process of obtaining ESA permits can impact infrastructure projects negatively, causing delays and additional costs. ESA consultation can stop projects in their tracks and add enormous costs to permitting for new operations, which provide job opportunities and are critical infrastructure improvements that will reduce climate impacts and improve the environments.

Specifically, we hope to work with the Department to clarify ESA goals to ensure species are removed from the list when desired population levels are met. We support allowing for expedited consultation for projects with minimal or beneficial impact and other programmatic changes intended to streamline the consultation process. Further, we look to find ways to promote standardized and transparent scientific decisions and increase consultation with local communities and stakeholders, who play a key role in protecting local wildlife.

### **Permit Streamlining**

The positive economic and environmental effects of increased infrastructure investments on public lands and across the country are only realized once the funds are efficiently and responsibly deployed into our communities. That said, under today's regulatory environment, public works project execution and infrastructure planning takes vast amounts of time and resources due to duplicative review processes and applications.

NSSGA recommends the Department execute on making needed reforms to the National Environment Protection Act (NEPA) in order to responsibly streamline project application timelines while maintaining appropriate federal oversight. Removing taxpayer dollars from unnecessary red tape and deploying them in needed infrastructure projects will unleash our economic potential by allowing investments in renewable energy, clean drinking water, affordable housing, efficient transit, and projects that reduce congestion and delays on our roads to finally move ahead.

### **Access to Federal Lands**

It is crucial for communities located near federal lands to access the key resources necessary for building roads, bridges, schools, hospitals, homes, and businesses. NSSGA has long opposed efforts to withdrawal mining rights on federal lands, where aggregates operations responsibly supply these construction materials.

Enacting unnecessary withdrawal proposals would significantly increase the cost of public works projects, resulting from the need to import the stone, sand and gravel required to develop and repair infrastructure and buildings. Further eliminating access to a material that is needed to develop a new clean water project and cleaner energy sources will have real environmental impacts on establishing cleaner air and water and access to public lands and improvements in National Parks and reaction areas. The majority of environmental impacts stem from

transporting construction materials. When aggregates extraction is banned from an area, needed materials must be transported, often via trucks, for longer distances. This creates more greenhouse gas and other emissions.

Instead of taking broad, unilateral actions to withdraw access to these lands, NSSGA urges the Department to consult with local stakeholders, communities, and tribes to find more tailored approaches to preserve treasured lands.

### **30 by 30 Proposal**

NSSGA would appreciate receiving greater clarity on the Administration's "30 by 30" initiative that seeks to place 30 percent of our nation's public and private lands in permanent conservation status in nine years. Our members are proud to conduct conservation practices across their land and donated reclaimed mines to communities across the US for water storage, habitat, and recreational public parks.

Proposals that could severely limit the ability to develop quarries and plants that are essential to producing construction materials could have detrimental impacts on Western communities. NSSGA supports greater clarification of the proposal and how the Administration plans to engage stakeholders, like local aggregates operators that are essential to building infrastructure.

Thank you for your consideration of our views and please do not hesitate to reach out if NSSGA may be of any assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Johnson", with a long horizontal flourish extending to the right.

Michael W. Johnson  
President and CEO  
National Stone, Sand and Gravel Association