



NATIONAL STONE, SAND  
& GRAVEL ASSOCIATION

October 13, 2022

The Honorable Charles Schumer  
Senate Majority Leader  
United States Senate  
322 Hart Senate Office Building  
Washington, DC 20515

The Honorable Mitch McConnell  
Senate Minority Leader  
United States Senate  
317 Russell Senate Office Building  
Washington, DC 20515

Dear Leader Schumer, Leader McConnell, Speaker Pelosi, and Leader McCarthy:

On behalf of the 400 members of the National Stone, Sand & Gravel Association (NSSGA) I am writing to share our strong support for [S. 4815](#), the Simplifying Timelines and Assure Regulatory Transparency Act (START Act). This bill is crucial, as it will provide reforms to regulations and permitting timelines; which are needed in order to help modernize our infrastructure. We thank Senator Capito for her work in authoring this legislation that takes needed steps to help build America.

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 2.56 billion tons of stone, sand and gravel produced 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.

The START Act promotes a number of sound permitting policies, most importantly, codifying needed reforms to the National Environmental Permitting Act (NEPA) process under Section 2. Earlier this year, the White House Council on Environmental Quality (CEQ) broadened NEPA definitions and added duplicative federal agency reviews that will do nothing to improve environmental outcomes. What is more frustrating is that these new rules run counter to the bipartisan NEPA reforms that were included in the Infrastructure Investment and Jobs Act (IIJA) which was signed into law last November. The START Act eliminates these new, unnecessary requirements and implements much-needed changes to the outdated NEPA process, placing investments for new roads bridges, tunnels, clean energy, water, ports, and rail on a path of regulatory certainty.

NSSGA strongly supports Section 3 which codifies the Navigable Waters Protection Rule (NWPR). The aggregates industry requires certainty under the NWPR to plan, develop and operate aggregates facilities that supply our modern world with needed building materials. Currently, the Biden Administration is working through a new rulemaking that would once again alter the definition of the “waters of the United States” (WOTUS) under the Clean Water Act – the fourth change in a decade. The



proposed rule will make it harder and more costly to permit facilities at a time when our nation is needing new sources of aggregates to build. By codifying NWPR, the START Act continues to protect our nation's water and will help to provide clarity on several key exclusions such as, ponds built on dry land; pits and basins associated with mining; and streams that only convey water after storm events. The legislation will also provide the aggregates industry with a clear framework, from which they can work towards supplying our nation with the aggregates required.

NSSGA members strongly urge Congress to approve the START Act, as it would provide greater certainty to many permitting decision timelines that are currently hindering our ability to effectively develop infrastructure across the nation. These commonsense bills will help deliver the bipartisan infrastructure improvements American communities were promised while not sacrificing environmental outcomes.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Johnson', written over a white rectangular background.

Michael Johnson  
President and CEO  
National Stone, Sand & Gravel Association

