



NATIONAL STONE, SAND
& GRAVEL ASSOCIATION

September 18, 2023

Administrator Richard L. Revesz
Office of Information and Regulatory Affairs
Office of Management and Budget
Executive Office of the President
1600 Pennsylvania Ave. NW
Washington, DC 20500

RE: Request for Comments on Proposed Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis; (88 Fed. Reg. 50912 – 50914, August 2, 2023)

Dear Administrator Revesz:

The National Stone, Sand and Gravel Association (NSSGA) would like to take this opportunity to provide comments in response to the Office of Management and Budget's ("OMB") Aug. 2, 2023, "Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis" (Draft Guidance).

NSSGA members consist of stone, sand and gravel producers; industrial sand suppliers; and the equipment manufacturers and service providers who support them. With upwards of 9,000 locations, the aggregates industry produces 2.5 billion tons of materials used annually in the United States. Aggregates are the building blocks of our modern society and are needed to construct and maintain roads, railways, bridges, tunnels, water supply, sewers, electrical grids and telecommunications.

NSSGA is also a signatory to comments submitted by the U.S. Chamber of Commerce and strongly supports OMB adopting the recommendations laid out by the broader business community to reduce regulatory burdens faced by our industry, as we seek to supply the needed construction materials to modernize and improve our world.

Our industry is heavily regulated from federal, state, and local entities. These regulations are ever changing, and many times are contradictory, causing significant delay and expense for approving projects. Our industry is facing greater regulatory uncertainty, as federal agencies work to implement a vast array of costly and complex permitting changes that will place new burdens and complicate our ability to access and supply materials. We strongly encourage OMB to use the greatest flexibility possible when considering how regulatory changes impact industry.

Increasing flexibility and promoting a sound, predictable regulatory environment will help improve ecosystem outcomes and create a more sustainable world.



Even though we face almost endless red tape, our industry goes above statutory requirements to improve eco-systems and lands. NSSGA members actively manage millions of acres of land and use a long-term, holistic approach that prioritizes the preservation of land, water, and biodiversity. From development to end-of-life reclamation, the aggregates industry actively strives to find every avenue to promote conservation. Our industry has won numerous awards for promoting the value of nature and establishing a role for operational sites that can offer a wide range of habitats where biodiversity can flourish. From establishing wetlands, critical habitats, carbon sinks, to pollinator gardens and nesting habitats, we take every opportunity to improve the world around us on the land we utilize.

In addition, our materials are essential to everyday life and are utilized in projects that deliver better environmental outcomes. Aggregates and industrial sand are needed to bring renewable energy and clean water to every community. Approximately 6 million tons of aggregates are annually used nationwide to build wind turbines. For example, each individual turbine utilizes 700 cubic yards of concrete composed of 650 tons of aggregates and 500 tons of sand. Further, 30 million tons of crushed stone and other aggregates that make up concrete are used to build and maintain waterlines each year.

Burdensome and duplicative permitting hurdles delay and sometimes stop altogether, thousands of transformative projects that benefit our environment from coming to fruition. They also make it harder for our members to access and bring to market the materials needed to build. Every day that passes with a delay, it places more strain on our industry, as prices increase and uncertainty compounds.

As OMB works to update its draft guidance, we urge greater consideration on the impact of regulatory decisions on our members' ability to contribute to environmental improvement and supply needed materials to build projects that enhance our eco-systems.

Thank you for the consideration. If you have any questions, please reach out anytime.

Sincerely,



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

