



09/26/2025

Dear Chairman Westerman and Congressman Golden,

The American Public Works Association (APWA) represents 32,000 public works professionals across North America who serve in both the public and private sectors providing expertise at the local, state, and federal government levels. Working in the public interest, our members plan, design, build, operate, and maintain, America's vast infrastructure network that is so fundamental to our economy, environment, public health, and safety.

APWA would like to express our appreciation for the reforms Chairman Westerman and Congressman Golden have included in the SPEED Act of 2025. This draft legislation contains important provisions that address many of APWA's concerns, including:

- Clarifying the definition of "reasonably foreseeable" to only include areas directly affected by the major Federal action, directly under the control of the agency, and having a reasonably close causal relationship between a change in the environment and the project.
- Stating that no federal agency shall be required to consider any research after the receipt of a completed application.
- Limiting cooperating agencies' comments to matters relating to the proposed action and within their jurisdiction by law or special expertise.
- Establishing parameters and a timeline around judicial review of environmental documents and final agency actions.

NEPA is important to public works because it serves as the regulatory framework for considering environmental protection throughout project planning, design, and construction. However, 55 years of well-intended updates have led to an inefficient and onerous process. The administrative burdens placed on the local government agencies, design professionals working on projects, contractors, and inspectors are expensive. APWA members have testified to the fact that the procedural requirements mandated for federally funded projects can increase cost by 25%. Additionally, more complex projects may also carry a higher potential for costly litigation, further dissuading communities from taking on this critical work.

The changes initially proposed in the BUILDER Act and finalized as part of the Fiscal Responsibility Act have been vital in delivering a more coordinated, predictable, transparent, and expedited permitting process. This legislation reemphasizes these commonsense reforms, and APWA looks forward to working with Chairman Westerman and Congressman Golden as this bill progresses.

Sincerely,

A handwritten signature in blue ink that reads "Tyler K. Hill".

Tyler K. Hill, KY Chapter President