



June 25, 2025

The Honorable Sam Graves
Chairman
U.S. House Committee on Transportation and Infrastructure
2165 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Graves,

On behalf of the American Cement Association (ACA), National Asphalt Pavement Association (NAPA), National Ready Mixed Concrete Association (NRMCA) and the National Stone, Sand & Gravel Association (NSSGA), and our member companies that supply critical construction materials for roads, infrastructure, energy, and agriculture, we write to express our strong support for the legislative package introduced by the House Transportation & Infrastructure Committee on June 12, 2025, to streamline Clean Water Act (CWA) permitting. We applaud your leadership in advancing common-sense reforms that protect water quality and promote essential domestic infrastructure.

This legislative package offers essential, common-sense reforms that reduce the construction materials industry's costly and unpredictable permitting delays. These bills protect operators from regulatory overreach and procedural abuse by establishing clear jurisdictional boundaries and predictable timelines, often resulting in unnecessary project slowdowns or cancellations. This certainty is critical to meeting growing national demands for the industries supplying the foundational materials for America's roads, bridges, energy systems, and other infrastructure.

Moreover, these reforms directly support the United States' broader infrastructure and economic goals. They align with Congress's bipartisan commitment to rebuild and modernize the nation's physical assets while strengthening domestic supply chains and creating high-quality jobs. By removing regulatory bottlenecks and ensuring efficient project delivery, this package helps to ensure that essential construction materials can flow unimpeded to construction sites across the country by supporting growth, competitiveness, and sustainability. NSSGA, NAPA, NRMCA and ACA's members stand to benefit from both the immediate streamlining of project approvals and the long-term stability these policies provide.

Specifically, we endorse the following bills –

H.R. 3898 — Promoting Efficient Review for Modern Infrastructure Today (PERMIT) Act

This bill codifies longstanding exemptions for water treatment systems, ephemeral features, groundwater, and prior converted cropland, effectively enshrining clarity and predictability into

WOTUS. These provisions for the construction materials industry are crucial in avoiding unnecessary delays and costs, without compromising environmental protection.

H.R. 3928 — Improving Water Quality Certifications and American Energy Infrastructure Act

This legislation curtails procedural abuse by narrowing states' scope under Section 401 to only federally regulated discharges and enforces a 90-day deadline for state certification decisions. This ensures reliable timelines for permitting processes affecting energy, aggregate, and construction industries.

H.R. 3927 — Nationwide Permitting Improvement Act

This measure modernizes federal general permits under Section 404, extends their renewal period from five to ten years, and supports the maintenance and expansion of linear projects (e.g., pipelines, utilities, roadways). All our members would directly benefit from this bill's passage by improving certainty across their sites and projects. If enacted, our customers will be able to meet the increased demand when going into the next surface reauthorization bill.

H.R. 3901 — Jurisdictional Determination Backlog Reduction Act

This proposal will require the Army Corps of Engineers to eliminate its backlog of CWA Section 404 jurisdictional determinations and pending permit applications. Timely determinations support project schedules and promote job growth. For instance, a 2002 study found that it takes an average of 313 days to obtain an NWP, while the average time to secure an individual permit was 788 days. A jurisdictional determination is the only process to receive a definitive, official conclusion about whether there are jurisdictional aquatic resources on a parcel. Our members in some areas of the country report that obtaining a jurisdictional determination takes over a year. Addressing this backlog is crucial for eliminating costly uncertainty for our industries.

We strongly urge the Committee to move forward with these bills and for the House to adopt this package swiftly. NSSGA, NRMCA, NAPA and ACA stand ready to collaborate further on refining and implementing these critical reforms.

Thank you for your leadership.

Sincerely,

American Concrete Association
National Asphalt Pavement Association
National Ready Mixed Concrete Association
National Stone, Sand & Gravel Association