

Portland Cement Association
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March 10, 2020

Edward A. Boling
Associate Director for the National Environmental Policy Act
Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20503

RE: Docket No. CEQ-2019-0003, Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act, 85 Fed. Reg. 1,684 (January 10, 2020)

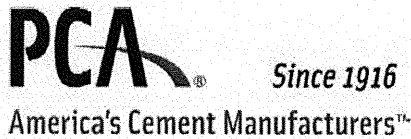
Dear Mr. Boling:

The Portland Cement Association (“PCA”) appreciates the opportunity to submit comments supporting the Council on Environmental Quality’s (“CEQ”) Proposed Rule on the Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA), Docket No. CEQ-2019-0003, 85 Fed. Reg. 1,684 (January 10, 2020) (“Proposed Rule”). In addition, PCA supports technical comments submitted by the Unlock American Investment Coalition led by the U.S. Chamber of Commerce on March 10, 2020.

PCA, founded in 1916, is the premier policy, research, education, and market intelligence organization serving America’s cement manufacturers. PCA members represent 91 percent of the United States’ cement production capacity and have facilities in all 50 states. Cement and concrete product manufacturing, directly and indirectly, employs approximately 600,000 people in our country, and our collective industries contribute over \$100 billion to our economy. Portland cement is the fundamental ingredient in concrete. The Association promotes safety, sustainability, and innovation in all aspects of construction fosters continuous improvement in cement manufacturing and distribution and promotes economic growth and sound infrastructure investment.

PCA strongly supports the Proposed Rule modernizing and streamlining NEPA Implementing Regulations. The proposed revisions will facilitate more efficient and timelier NEPA reviews for infrastructure projects across the nation, many of which use cement and concrete, that will enhance economic growth while also ensuring environmental protection. NEPA and the Implementing Regulations have slowed and impeded the development of needed infrastructure as NEPA reviews average four and half years to complete and seven years for federal highway projects. Streamlining NEPA will be particularly important to combating climate change as key pipeline infrastructure will be needed for manufacturing facilities in rural areas to have access to lower-emitting natural gas and enable transport of carbon dioxide captured at industrial sources for ultimate sequestration or utilization.

PCA and the North American Concrete Alliance submitted comments on August 20, 2018 on the Advanced Notice of Proposed Rulemaking published in the Federal Register on



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June 20, 2018.¹ PCA emphasized some of the key revisions that CEQ puts forth in the Proposed Rule, particularly setting time limits for NEPA reviews, giving the Lead Agency greater authority to manage NEPA reviews, limiting the consideration of the range of alternatives, and reducing the length of NEPA documents.

CEQ requested specific comment on whether to incorporate the “Draft National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions” into the NEPA Implementing Regulations (“Draft GHG Guidance”). PCA agrees with CEQ and does not think that the Draft GHG Guidance should be incorporated into the Implementing Regulations for this Proposed Rule. PCA agrees that it is not appropriate to address a single category of impacts, such as climate change, in this Proposed Rule revising the Implementing Regulations.

PCA appreciates the opportunity to express our support for the Proposed Rule. The proposed revisions to NEPA Implementing Regulations will ensure our nation’s environment is protected while facilitating greater infrastructure investment. If you have any questions regarding these comments, please feel free to contact me at 202-719-1977 or cfranklin@cement.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles L. Franklin', followed by a horizontal line extending to the right.

Charles L. Franklin
Vice President & Counsel
Government Affairs

¹ 83 Fed. Reg. 28591