

## Support Comprehensive Permitting Reform

NECA contractors deliver transmission, grid modernization, federal facility electrical work, and critical infrastructure projects that often require multi-agency federal approvals. Predictable, efficient permitting is essential to mobilize crews, manage costs, and meet national energy and infrastructure goals.

### One Federal Decision-Style Permitting Reform:

**Ask:** Codify key elements of the current administration’s permitting reform efforts—specially the One Federal Decision (OFD) framework and NEPA streamlining directives—into permanent statute. Major electrical and infrastructure projects routinely face multi-year delays caused by fragmented, sequential reviews across multiple agencies.

Clear statutory timelines, a single lead agency, and coordinated reviews provide legal certainty, reduce litigation risk, and unlock billions of dollars in transmission, grid, and infrastructure work.

### Priority #1: Codify One Federal Decision Framework (EO 13807)

Executive Order 13807 established the OFD framework for “major infrastructure projects,” requiring coordinated, timely environmental reviews with clear deadlines and accountability. Key elements to codify include:

- **Two-year statutory deadline** for completion of NEPA environmental reviews for major infrastructure projects, with limited, clearly defined extensions.
- **A single lead federal agency** responsible for managing the overall review, schedule, and record of decision, with cooperating agencies bound to the agreed timeline.
- **One consolidated environmental document** and a single joint Record of Decision or Finding of No Significant Impact to replace duplicative, sequential reviews.
- **A publicly posted permitting timetable** with key milestones.
- **Concurrent—not sequential—permit processing** across all relevant federal agencies to compress critical-path timelines for major infrastructure.

### Priority #2: NEPA Streamlining and Efficiency Mandates

Current agency directives to the Council on Environmental Quality emphasized efficiency, certainty, and clear procedural boundaries in NEPA implementation. Codifying these principles will promote durable, bipartisan permitting reform that supports energy and infrastructure deployment. Key elements to codify include:

- **Statutory time and page limits for environmental documents** (e.g., EIS: 2 years and 300 pages; EA: 1 year and 75 pages), with targeted exceptions.
- **Clarify that NEPA is a procedural statute**, not a mandate to analyze every speculative cumulative or indirect effect, helping reduce litigation over the scope of analysis.
- **Require agencies to leverage existing data and prior NEPA reviews** where appropriate, instead of restarting analysis from scratch.

**Priority #2: NEPA Streamlining and Efficiency Mandates (cont.)**

- **Expand and standardize categorical exclusions (CEs)** for routine, low-impact electrical infrastructure work—such as reconductoring, equipment replacement within existing rights-of-way, substation upgrades, and minor grid interconnections.

**Impact on NECA Projects:**

Expanded CEs allow routine maintenance, resiliency upgrades, and incremental capacity additions—like transformer replacements, line upgrades, EV charging add-ons, and broadband co-deployments—to advance quickly without triggering multi-year reviews. Streamlined NEPA processes keep the grid reliable and modern, support workforce stability, and allow for timely delivery of federally funded infrastructure projects.



The **National Electrical Contractors Association (NECA)** is the voice of the \$270 billion electrical construction industry that brings power, light, and communication technology to buildings and communities across North America. NECA's national office and 118 local chapters advance the industry through advocacy, education, research, and standards development.

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