



October 3, 2025

Washington State Department of Ecology  
Attn: Eric Daiber  
PO Box 47696  
Olympia, WA 98504-7696

**Re: Concerns with Draft Sand and Gravel General Permit (SGGP) Reissuance**

Dear Mr. Daiber,

I am writing on behalf of the Associated Builders and Contractors Inland Pacific Chapter (ABC IPC), representing merit shop contractors across Eastern Washington who depend on a steady, affordable supply of aggregates, asphalt, and ready-mix concrete. While most of our contractors are not direct permittees under the Sand and Gravel General Permit (SGGP), the proposed changes will significantly impact our members as downstream purchasers of regulated materials.

Facilities covered under the SGGP include sand and gravel pits, rock quarries, concrete batch plants, and asphalt operations. Compliance with the new monitoring, lined impoundment, chemical use, and site management requirements will require major capital upgrades and ongoing costs. Those costs will be passed through in the form of higher material prices. Contractors working under fixed-price contracts cannot absorb these increases, resulting in higher bids, reduced competitiveness, and fewer projects moving forward.

The fact sheet acknowledges new restrictions on truck wash water, lined impoundments, and BMP implementation. These requirements, while well-intentioned, will disrupt production schedules at aggregate and concrete facilities. Contractors rely on just-in-time delivery of these products; delays will cascade into missed deadlines, idle labor, and liquidated damages on both public and private projects.

Every road, bridge, school, and utility project in our region requires aggregates, asphalt, and concrete. By increasing the cost of these base materials, the draft SGGP will inflate public project budgets and limit how far taxpayer dollars stretch. For local governments, this means fewer miles of roadway paved and fewer school facilities built.

Many ABC IPC members are small to mid-sized contractors already operating on narrow margins. Rising material costs from SGGP compliance will force tough choices: reducing scope, postponing hiring, or cutting jobs. This is particularly concerning in Eastern Washington, where construction drives a significant portion of the local economy.

We urge Ecology to:

- Reevaluate the Small Business Economic Impact Analysis to capture the true downstream effects on contractors, project owners, and taxpayers.
- Provide phased timelines to allow aggregate and concrete suppliers to adjust without creating immediate cost shocks.
- Ensure BMPs retain flexibility for site-specific conditions rather than imposing overly prescriptive, one-size-fits-all mandates.
- Engage directly with contractor associations to better assess impacts on project delivery.

ABC IPC and its members are committed to protecting Washington's water quality while building the infrastructure our state needs. However, the SGGP as currently drafted will raise construction costs, slow project delivery, and harm small contractors and workers who are not even direct permit holders. We respectfully request significant revisions before final reissuance.

Sincerely,

A handwritten signature in blue ink that reads "Sarah Cottam". The signature is written in a cursive, flowing style.

Sarah Cottam  
President & CEO  
Associated Builders and Contractors – Inland Pacific Chapter