

Submitted Via Regulations.gov
Federal E-Rulemaking Portal

RE: Department of Agriculture, Docket ID: USDA-2025-0008
Department of the Army, Docket ID: USA-2025-HQ-0003
Department of Energy, Docket ID: DOE-HQ-2025-0026
Department of the Interior, Docket ID: DOI-2025-0004
Department of the Navy, Docket ID: USN-2025-HQ-0004
Department of Transportation, Docket ID: DOT-OST-2025-0171
U.S. Army Corp of Engineers, Docket ID: COE-2025-0007
U.S. Army Corp of Engineers, Docket ID: COE-2025-0006-0002
Federal Aviation Administration, Docket ID: FAA-2025-1571
Federal Highway Administration, Docket ID: FHWA-2025-0007
National Highway Traffic Safety Administration, Docket ID: NHTSA-2025-0160

August 4, 2025

To Whom It May Concern:

On behalf of the undersigned 228 organizations and Tribes, and our millions of members and supporters nationwide, we submit these comments on the sweeping changes to the National Environmental Policy Act (NEPA) implementing procedures of over a dozen separate federal departments and agencies. NEPA is the Nation's environmental charter protecting Americans' right to a safe and healthy environment. Enacted in 1970 by overwhelming bipartisan majorities, and amended in 2023, NEPA directs all federal agencies to take into account, and publicly disclose, the environmental, health, and related social and economic consequences of their proposed actions before taking steps that may significantly affect the quality of the human environment. The NEPA process serves two essential purposes: it promotes sound and environmentally-informed decisionmaking by federal agencies, and it provides the primary way for the public to learn about and provide input regarding the impacts of federal actions on their lives and communities.

For decades federal agencies, project proponents, courts, tribes, and the public relied upon White House Council on Environmental Quality (CEQ's) NEPA regulations, which applied to over 80 federal agencies, for a clear and thoughtful roadmap for how environmental impact analysis pursuant to the Act should take place. The rescission of CEQ's regulations in March of this year left a gaping hole in the government decisionmaking process. With the simultaneous announcements related to these agencies' NEPA regulations on July 3, the consequences of CEQ's rescission are now disturbingly apparent. It is forcing the public and businesses to rely on a patchwork of agency-specific NEPA interpretations and will inevitably lead to unnecessary confusion, delay, and litigation regarding the development of federal projects and the spending of taxpayer dollars. Moreover, the new procedures issued by these agencies make clear that they will lead to substantially less – not more – transparency and regulatory and management certainty.

Inadequate Process of Revision of NEPA Regulations

The litany of agencies simultaneously announcing fundamental and severe changes to their individual NEPA procedures—with only limited time to review and comment—creates an impossible situation for the public, local governments, tribes, and project sponsors. These stakeholders have relied on consistent sets of NEPA regulations, underpinned by the CEQ’s regulations, for nearly fifty years. Given only 30 days to comment on several hundred pages of detailed policy changes, at 16 federal agencies—changes that will reshape not only how the federal government considers the health, environmental, and economic impacts of its actions, but also whether it discloses those impacts or seeks input from the affected public—our organizations are offering these broadly applicable comments detailing agency responsibilities under NEPA. And the agencies’ choice to make the procedures final and immediately effective strongly suggests a lack of interest in public input altogether.

We note at the outset that agencies’ processes around revising their NEPA regulations are not only inadequate, but also unprecedented in multiple ways. First, the 30-day comment period on these regulatory changes is wholly inadequate. Prior to CEQ’s 2020 revisions, the Trump administration afforded the public 61 days comment on an advanced notice of proposed rulemaking and then another 60 days comment on a notice of proposed rulemaking. In addition, public meetings were held in multiple locations around the country. Similarly, CEQ’s Phase 1 and Phase 2 rulemakings included 45- and 60-day public comment periods, respectively, along with additional public meetings. Those notice-and-comment rulemakings on a single set of regulations stand in stark contrast to the interim final rules most of the agencies have issued here—across 16 different sets of NEPA procedures. Expecting stakeholders to review, let alone provide comprehensive responses to, such sweeping changes in just 30 days is unreasonable and reflects a cynical disregard for the meaningful public engagement that both NEPA and federal administrative laws are designed to protect. Requests for extensions of the current comment periods were ignored.

Second, reducing the likelihood of meaningful public engagement, many agencies are relying on Interim Final Rules (IFRs) in clear violation of the Administrative Procedure Act (APA), 5 U.S.C. §§ 551 et seq. The APA “sets forth the procedures by which federal agencies are accountable to the public and their actions subject to review by the courts.” *Franklin v. Massachusetts*, 505 U.S. 788, 796 (1992). The APA defines three, extremely limited, situations in which agencies may skip notice and comment rulemaking, and courts have long held that these must be “narrowly construed and only reluctantly countenanced.” *New Jersey Dep’t of Env’t Prot. v. U.S. Env’t Prot. Agency*, 626 F.2d 1038, 1045 (D.C. Cir. 1980); see also *Alcaraz v. Block*, 746 F.2d 593, 612 (9th Cir. 1984) (same; cleaned up). None of these exceptions apply to rulemaking to rescind or revise agencies’ NEPA-implementing regulations, meaning that agencies must publish Notices of Proposed Rulemaking for public comment before proceeding to the final rule stage.

Agencies cannot rely on the exception that allows agencies to forego notice and comment rulemaking for internal, procedural guidance because these NEPA regulations and procedures are not merely procedural rules relating to “internal house-keeping measures.” *Am. Fed’n of Lab. & Cong. of Indus. Organizations v. Nat’l Lab. Rels. Bd.*, 57 F.4th 1023, 1034 (D.C. Cir. 2023) (discussing the “limited carveout” for procedural rules). The changes outlined in these agency NEPA regulations go well beyond housekeeping

and redefine the bounds of agency NEPA analysis, the thresholds for applying the statute, and whether and when the public may have an opportunity to comment.

Further, agencies' invocation of the "good cause" exception is likewise misplaced. The good cause exception is limited to situations where delay would be "impracticable, unnecessary, or contrary to the public interest" (§ 553(b)(B)), such as emergencies, circumstances where prior notice would subvert the regulatory goals, and where Congress clearly intended to waive notice-and-comment procedures.¹ None of these conditions apply here.

Finally, any reliance on the APA exception for statements of policy and interpretive rules similarly fails to withstand modest scrutiny. A set of procedures broadly determining whether and how the public may engage with federal agencies on decisions impacting the health, welfare, and safety of their communities is hardly a simple statement of policy.

Regulatory Fragmentation Will Lead to Uncertainty

We are alarmed by agencies' reliance on a recent executive order to ignore the law. Many agencies, relying on a recent executive order in their IFRs, state their goal is to achieve "efficiency and certainty over any other objective." This is fundamentally inconsistent with NEPA and appears to be an attempt to ignore the statutory purposes clearly articulated by Congress in Section 101. Congress did not enumerate "efficiency and certainty" as the policy of the federal government in NEPA. Rather, Congress stated that NEPA's purposes are "to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." While we have long advocated for greater efficiency and predictability in NEPA reviews — and have many positive ideas on how to achieve it — the administration is clearly more focused on getting fossil fuel and other polluting projects on the ground than it is in protecting public health and the natural environment.

Even if it were acceptable to prioritize efficiency and certainty above all other considerations to implement NEPA, having over 80 agencies in the federal government issue separate interpretations and different procedures — some via regulation and others via non-binding guidance — is not the way to achieve such goals. Efficiency and certainty were best achieved when CEQ provided a clear centralized baseline of regulations, grounded in decades of practice and case law, as was the case prior to the revocation of the regulations in March.

This new regulatory uncertainty and potential for significant delays, occasioned by the agencies' disruptive approach, will halt and reverse recent reforms in reducing permitting timelines. In January CEQ reported that NEPA timelines were significantly shorter than just a few years ago.² With clear regulations that reaffirmed agencies' long-standing responsibilities to assess both climate and

¹ Congressional Research Service, The Good Cause Exception to Notice and Comment Rulemaking: Judicial Review of Agency Action (Jan. 29, 2016), <https://www.congress.gov/crs-product/R44356>.

² White House Press Release: New Data Shows Biden-Harris Administration Improved Speed of Federal Permitting and Environmental Reviews, January 13, 2025. <https://bidenwhitehouse.archives.gov/ceq/news-updates/2025/01/13/new-data-shows-biden-harris-administration-improved-speed-of-federal-permitting-and-environmental-reviews/>

environmental justice impacts—and with increased funding from Congress—agencies were able to complete more NEPA reviews and did so significantly faster. For example, with funding from the Inflation Reduction Act and the regulatory certainty provided by CEQ, the Department of Energy successfully [cut timelines](#) for EISs related to clean energy and transmission in half over the past several years.³

Prior Regulations Reflected Statutory Mandates & Principles Agencies Must Incorporate

Importantly, NEPA itself contains the principles of sound environmental impact analysis that were embodied in CEQ and agency regulations. Those principles remain unchanged, and agency procedures must reflect them. Forty years of agency practice and judicial decisions construing the Act cemented CEQ's regulations as the benchmark for agencies, project proponents, and the public. Those principles include the need for accurate description of the existing environment in which a federal project will occur; rigorous assessment of the effects of the proposed action, including indirect and cumulative effects, on that environment; careful consideration of reasonable alternatives to the proposed action that may have less impact; and timely disclosure to the public with an opportunity for comment. *See Kleppe v. Sierra Club*, 427 U.S. 390, 410, 413 (1976); *Calvert Cliffs' Coordinating Comm., Inc. v. U.S. Atomic Energy Comm'n*, 449 F.2d 1109, 1114 (D.C. Cir. 1971); *Natural Resources Defense Council v. Morton*, 458 F.2d 827, 834-36 (D.C. Cir. 1972); *Hanly v. Kleindienst*, 471 F.2d 823, 830-31 (2d Cir. 1972); *Minnesota Public Interest Research Group v. Butz*, 498 F.2d 1314, 1322 (8th Cir. 1974); *Env'tl. Def. Fund, Inc. v. Corps of Eng'rs of U.S. Army*, 492 F.2d 1123, 1135 (5th Cir. 1974); *City of Davis v. Coleman*, 521 F.2d 661, 666-677 (9th Cir. 1975); *Natural Resources Defense Council v. Callaway*, 524 F.2d 79, 89 (2d Cir. 1975); *Swain v. Brinegar*, 517 F.2d 766 (7th Cir. 1975); *City of Rochester v. U.S. Postal Serv.*, 541 F.2d 967, 973-74 (2d Cir. 1976); *Brooks v. Coleman*, 518 F.2d 17, 18 (9th Cir. 1975); *Concerned About Trident v. Rumsfeld*, 555 F.2d 817, 825 (D.C. Cir. 1976); *Simmons v. U.S. Army Corps of Engineers*, 120 F.3d 664 (7th Cir. 1997). In addition, the regulations' longstanding requirement to ensure the scientific integrity of environmental reviews was codified in the 2023 NEPA statutory amendments.

NEPA's Mandate for Public Input and Government Transparency is Clear

NEPA's foundational premise is that full governmental transparency must be coupled with robust public participation to ensure federal agencies fully inform the public—and are, in turn, fully informed by the public—of a proposed project's social and environmental costs and benefits. In 1970, Congress declared that “it is the continuing policy” of the federal government to achieve the statute's goals “in cooperation with State and local governments, and other concerned public and private organizations[.]” 42 U.S.C. § 4331(a); *see also id.* § 4332(2)(J). The courts have long recognized this foundational principle. *See, e.g., Dep't of Transp. v. Pub. Citizen*, 541 U.S. 752, 768 (2004) (“The very purpose of public issuance of an environmental impact statement is to provide a springboard for public comment.”) (cleaned up); *Baltimore Gas & Elec. Co. v. Natural Resources Defense Council, Inc.*, 462 U.S. 87, 97 (1983) (the “informational role” of an environmental impact statement is to “give the public the assurance that the agency has considered environmental concerns in its decisionmaking process.”) (cleaned up); *Or. Natural*

³ White House Factsheet: Biden-Harris Administration Takes Action to Deliver More Projects More Quickly, Accelerates Federal Permitting, August 29, 2024. <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2024/08/29/fact-sheet-biden-harris-administration-takes-action-to-deliver-more-projects-more-quickly-accelerates-federal-permitting/>

Desert Ass'n v. Bureau of Land Mgmt., 625 F.3d 1092, 1121 n.24 (9th Cir. 2010) (NEPA is a “democratic decisionmaking tool”); *Sierra Club v. U.S. Army Corps of Eng'rs*, 772 F.2d 1043, 1049 (2nd Cir. 1985) (the detailed statement NEPA requires serves “as an environmental full disclosure law so that the public can weigh a project’s benefits against its environmental costs.”). And recent studies make it clear that public input makes a difference in and often improves agency decisionmaking.⁴ Disturbingly, in several, if not most of the agencies’ Interim Final Rules, agencies seem to be abdicating their responsibility to provide transparent decisions with meaningful public engagement, as evidenced by the lack of direction to publish draft environmental impact statements for public review.

Agencies Must Consider Environmental Justice and Climate Change

NEPA also requires consideration of environmental justice and climate change issues. Excising references to these concepts does not in any way relieve agencies of their responsibilities to consider them. While the term “environmental justice” only came into common use after the Act’s passage, its core principles are embedded in the law, which CEQ recognized just last year in finalizing the Phase 2 regulations. The statute strives “to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare” of people; it establishes “the continuing policy of the Federal Government” to “assure for *all Americans* safe, healthful, productive, and esthetically and culturally pleasing surroundings” and to “preserve important historic, cultural, and natural aspects of our national heritage.” It also “recognizes that *each person* should enjoy a healthful environment.” 42 U.S.C. §§ 4321, 4331(a), (b)(2), (b)(4), (c) (emphases added).

It has also long been CEQ’s policy and agency practice to consider environmental justice in NEPA reviews, and the courts have repeatedly recognized that agencies must assess environmental justice effects under NEPA. *Mid States Coal. for Progress v. Surface Transp. Bd.*, 345 F.3d 520, 541 (8th Cir. 2003); *Sierra Club v. FERC*, 867 F.3d 1357, 13368 (D.C. Cir. 2017); *Coliseum Square Ass’n, Inc. v. Jackson*, 465 F.3d 215, 232 (5th Cir. 2006); *Trenton Threatened Skies, Inc., v. Fed. Aviation Admin.*, 90 F.4th 122, 138 (3rd Cir. 2024); *City of Port Isabel v. FERC*, No. 23-1174, 2024 WL 3659344, at *7 (D.C. Cir. Aug. 6, 2024); *Vecinos para el Bienestar de la Comunidad Costera v. FERC*, 6 F.4th 1321, 1330–32 (D.C. Cir. 2021); *Standing Rock Sioux Tribe v. U.S. Army Corps of Eng'rs*, 255 F. Supp. 3d 101, 140 (D.D.C. 2017). A [2023 letter](#) signed by over 60 organizations reaffirmed the urgent need to keep environmental justice analysis in NEPA. Eliminating this environmental justice requirement undermines the statute’s original intent and marginalizes communities already struggling to be heard in decisions that directly affect them.

Likewise, NEPA calls on agencies to “fulfill the responsibilities of each generation as trustee of the environment for succeeding generations,” thus compelling the consideration of how climate change may affect the environmental consequences of a project, and how a project may contribute to or ameliorate climate change effects. 42 U.S.C. § 4331(b)(1). *See also* 42 U.S.C. § 4332(2)(C)(iv) (requiring agency environmental reviews to address “the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity”). The courts have increasingly and consistently required NEPA analyses to address these climate change-related effects on the quality of the human environment. *Vecinos para el Bienestar*, 6 F.4th at 1329–30; *350 Mont. v. Haaland*, 50 F.4th

⁴ Ashley Stava *et al* 2025 *Environ. Res. Lett.* 20 074028. Available at <https://iopscience.iop.org/article/10.1088/1748-9326/addee5>

1254, 1266–70 (9th Cir. 2022); *WildEarth Guardians v. U.S. Bureau of Land Mgmt.*, 870 F.3d 1222, 1236–38 (10th Cir. 2017); *Sierra Club*, 867 F.3d at 1371–75; *Mid States Coal. for Progress*, 345 F.3d at 550.

Agencies Must Consider Cumulative Effects

We also note that agencies are impermissibly adhering to guidance accompanying CEQ’s interim final rule, which suggested that agencies may disregard cumulative effects—contradicting both statutory text and long-standing judicial precedent. NEPA requires agencies to assess “major Federal actions significantly affecting the quality of the human environment” and consider “reasonably foreseeable environmental effects.” 42 U.S.C. § 4332(2)(C). Courts have consistently held that NEPA’s mandate includes disclosing cumulative effects. *See Hanly v. Kleindienst*, 471 F.2d 823 (2d Cir. 1972); *Sierra Club v. Morton*, 510 F.2d 813, 824 (5th Cir. 1975); *Henry v. Federal Power Commission*, 513 F.2d 395, 406 (D.C. Cir. 1975); *Swain v. Brinegar*, 542 F.2d 364, 369-70 (7th Cir. 1976).

Attempts to strip away the requirement for cumulative effects analysis undermines NEPA’s core function and risks serious harm to communities and the environment. Assessing cumulative effects is essential to understanding how large projects—such as highways, pipelines, and industrial facilities—compound pollution burdens, degrade ecosystems, and accelerate climate change. Without this analysis, agencies obscure the broader, long-term consequences of their decisions—consequences that disproportionately harm frontline communities, including Tribal Nations who already face layered harms from historic disinvestment, land dispossession, and ongoing environmental degradation. Ignoring cumulative impacts further marginalizes these communities, denying them meaningful protection under environmental law and violating the federal government’s trust and treaty responsibilities to Tribal Nations.

Agency Should Not Rely on 2020 Regulations

We are alarmed by language in the guidance accompanying CEQ’s Interim Final Rule revoking their regulations which “encourage[d] agencies to use the final 2020 rule ‘Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act’ as an initial framework for the development of revisions to their NEPA implementing procedures.” Unfortunately, it now appears many agencies adhered to that recommendation from CEQ.

Many of our organizations were among the over 300+ organizations that signed a letter opposing the 2020 revisions, which were rightly the subject of numerous lawsuits. Those regulations fundamentally mischaracterized the purpose of NEPA, re-ratified by the 2023 statutory amendments, and, among other fatal defects, sought to enshrine climate denial and environmental injustice in government decision-making. The regulatory process that produced the 2020 rule was itself fatally flawed both procedurally and substantively, in violation of the APA. Agencies seeking to rely on the 2020 regulations as a guide for their own implementing regulations risk further controversy and potential litigation.

We also note that Tribal Nations were not invited to engage in government-to-government consultation on any of these new agency regulations—making a sharp departure from prior CEQ rulemakings in 2020, 2021, and 2023. Given the broad impacts these regulations will have on Tribal Nations, lifeways, and

treaty rights, this failure to consult is unacceptable and legally indefensible. Reckless regulatory changes also pose a real threat to cultural resources, sacred places, and Tribal sovereignty.

Agencies must continue to adhere to the foundational principles of NEPA: sound environmental review and analysis, including governmental transparency and robust public participation, that stem from the Act's statutory text. While procedural efficiency is important, it must never come at the expense of Tribal Nations or frontline communities who bear the brunt of environmental degradation and public health burdens. Agencies must ensure their NEPA procedures are aligned with the law's purpose: to make informed, equitable decisions that safeguard the people and the planet. Any departure from that standard not only violates NEPA—it will not withstand legal scrutiny.

Sincerely,

198 methods
350 Bay Area Action
350 Eugene
350 Seattle
350Brooklyn
350PDX
350Wenatchee
412 Justice
7 Directions

Advocates for Snake Preservation
Alaska Longline Fishermen's Association
Alaska Wilderness League
Alliance BioConversions Consulting (ABCC)
Alliance of Nurses for Healthy Environments
Animal Welfare Institute
Appalachian Citizens' Law Center, Inc.
Appalachian Voices
Aquatic Research Conservancy
Association of Northwest Steelheaders
Attorneys for Animals

Bark for Mt Hood
Basin and Range Watch
Better Path Coalition
Black Hills Clean Water Alliance
Black Hills Preservation Project
Bold Alliance
Breathe Easy Susquehanna County

California Native Plant Society
Californians for Western Wilderness

CalWild
Cascade Forest Conservancy
Cascade Volcanoes Chapter Great Old Broads
for Wilderness
Cascadia Wildlands
Center for Biological Diversity
Center for Environmental Health
Center for Oil and Gas Organizing
Center for Progressive Reform
Central Sierra Environmental Resource Center
Central/Eastern Oregon Bitterbrush Broadband
Change the Chamber
Chesapeake Climate Action Network
Chesapeake Climate Action Network Action
Fund
Citizens for Alternatives to Radioactive
Dumping (CARD)
Citizens Resistance At Fermi Two (CRAFT)
Clean Water Action
Climate Action Campaign
Climate Hawks Vote
Climate Justice Alliance
Coalition to Protect America's National Parks
Colorado Wildlands Project
Columbia Riverkeeper
Compressor Free Franklin
Concerned Citizens for Nuclear Safety
Concerned Citizens Retired Miners Coalition of
Superior, AZ
Conservation Law Foundation
Consolidated Oregon Indivisible Network -
COIN

Consumer Federation of America
Continental Divide Trail Coalition
CRA
Crag Law Center

Dakota Resource Council
DamTruth
Defenders of Wildlife
Delaware-Otsego Audubon Soc. (NY)
Diné C.A.R.E.
Don't Gas the Meadowlands Coalition

Earth Neighborhood Productions
Earthjustice
Earthworks
Eastern Pennsylvania Coalition for Abandoned
Mine Reclamation
Endangered Habitats League
Endangered Species Coalition
Environmental Law & Policy Center
Environmental Protection Information Center -
EPIC

Farm Aid
Feather River Action!
Food & Water Watch
Friends of Buckingham
Friends of Merrymeeting Bay
Friends of the Earth
Friends of the River

Gila Resources Information Project
Great Basin Water Network
Great Bear Foundation
Green America
GreenLatinos

Healthy Environment Alliance of Utah (HEAL
Utah)
Healthy Ocean Coalition
Heaven on Earth
Honor the Earth
Humane World Action Fund
Humane World for Animals

Idaho Conservation League
Idaho Rivers United
IDARE LLC
Indian Creek Watershed Association
Indivisible Bend
International Marine Mammal Project of Earth
Island Institute
Izaak Walton League - Rapid City SD Chapter

Klamath Forest Alliance

Lassen Forest Preservation Group
Last Tree Laws Massachusetts
Latino Justice PRLDEF
League of Conservation Voters
Legal Rights for the Salish Sea
Los Padres ForestWatch
Loudoun Climate Action

Malach Consulting
Massachusetts for Safe Technology
Michigan Environmental Justice Coalition
Mining Impact Coalition of Wisconsin
Montana Environmental Information Center
Montana Wilderness Education School

National Aquarium
National Call for Safe Technology
National Parks Conservation Association
National Wildlife Federation
Native Village of Fort
Natural Resources Defense Council
NETWORK Lobby for Catholic Social Justice
New Franklin Register
New Mexico Environmental Law Center
New Mexico Wild
New York Civil Liberties Union
Next 100 Coalition
Nimiipuu Protecting the Environment
Nolichucky Watershed Alliance
North Cascades Conservation Council
Northcoast Environmental Center

Northeast Organic Farming Assoc of New York,
Inc

Northeastern Minnesotans for Wilderness
Northern Alaska Environmental Center
Northern Plains Resource Council
Northwest Sportfishing Industry Association
Norton Bay Watershed Council
NYC Alliance for Safe Technology
NYPAN environmental committee

Ocean Conservancy
Ocean Conservancy Foundation
Ocean Conservation Research
Ocean Defense Initiative
Oceana
Old Spanish Trail Association
Oregon Conservancy Foundation
Oregon Natural Desert Association
Oregon Wild

PACAN
Pennsylvanians for Safe Technology
Plug In America
Port Gamble S'Klallam Tribe
Prairie Hills Audubon Society (of Western SD)
Predator Defense
Preserve Giles County
Project Eleven Hundred
Property Rights and Pipeline Center
Protect Our Water, Heritage, Rights
PSR PA

RI4SafeTech
Rivers Without Borders
Rock Creek Alliance

SAFE Alternatives for our Forest Environment
Save Our Cabinets
Save Our wild Salmon Coalition
Save the Manatee Club
Save the Pine Bush
Save the Sound
Sawtooth Science Institute
Seneca Lake Guardian

Seven Circles Foundation
Sierra Club
Sierra Foothills Audubon Society
Sierra Forest Legacy
Sierra Nevada Alliance
Silvix Resources
Snowlands Network
Soda Mountain Wilderness Council
Southeast Alaska Conservation Council
Southern Environmental Law Center
Southern Utah Wilderness Alliance
Southwest Pennsylvania for Safe Technology
Spokane Audubon Society
Standing Trees
Surfrider Foundation
Susitna River Coalition

TCAT/Tree Action Group
The Alaska Center
The CLEO Institute
The Fire Restoration Group
The Forest Advocate
The National Call for Safe Technology
The Norbeck Society
The Rewilding Institute
The Santa Fe Forest Coalition
The Wilderness Society
Tualatin Riverkeepers
Tuleyome
Turtle Island Restoration Network

Ubuntu Power Project
UC Irvine School of Law Center for Land,
Environment & Natural Resources
Umpqua Natural Leadership Science Hub
Umpqua Watersheds
University of Washington
Upper Gila Watershed Alliance
Uranium Watch

Village of Solomon
Virginia Citizens Consumer Council

Waterkeeper Alliance

Waterkeepers Chesapeake
Waterspirit
WE ACT for Environmental Justice
Weber Sustainability Consulting (retired)
West End Revitalization Center (WERA)
Western Environmental Law Center
Western Organization of Resource Councils
Western Shoshone Defense Project
Western Slope Conservation Center
Western Watersheds Project
Western Wildlife Conservancy
Wild Hope
Wild Montana
WildEarth Guardians
Wilderness Workshop
Wildlife for All
Wired Broadband, Inc.
Wyoming Untrapped
Wyoming Wildlife Advocates

Young, Gifted & Green

Zero Hour