

August 1, 2022

Michael Regan, Administrator  
U.S. Environmental Protection Agency  
EPA Docket Center, Office of Land and Emergency Management  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

*Regan.Michael@epa.gov*

**Re: Call for Rulemaking to Stop Pollution from Legacy Coal Ash Ponds and Inactive Landfills**

Dear Administrator Regan:

The undersigned 121 national, regional, and grassroots public interest groups and tribal communities from 30 states, the District of Columbia and Puerto Rico urge you to immediately undertake a rulemaking to strengthen the Coal Combustion Residuals (“CCR”) Rule<sup>1</sup> to stop toxic pollution from legacy surface impoundments and inactive landfills. Dangerous loopholes in the current CCR Rule leave hundreds of polluting coal ash dumps outside the scope of the federal rule. The drinking water, health, well-being, and environment of communities across the nation are harmed by the failure of the U.S. Environmental Protection Agency (“EPA”) to address these dangerous sources of pollution.

Regulations requiring cleanup and safe closure of all toxic coal ash dumps are urgently needed and long overdue. The CCR Rule currently has no provision specifically regulating coal ash disposed in more than 200 surface impoundments (“legacy ponds”) located at power plants that ceased generating electricity before the effective date of the rule (October 19, 2015). Similarly, the CCR Rule exempts coal ash landfills *at any location* from all regulatory safeguards if the landfills did not receive waste after such date. At least 285 inactive landfills are currently exempted. The CCR Rule’s dangerous loopholes leave nearly as much toxic coal ash unregulated as EPA currently regulates.

**EPA has a legal duty to take immediate rulemaking action to protect human health and the environment**

In August 2018, the D.C. Court of Appeals ordered EPA to address the looming threat posed by legacy ash ponds located at retired power plants.<sup>2</sup> The court directed EPA to establish stringent safeguards requiring the safe closure and cleanup at hundreds of abandoned toxic ash ponds. Yet four years have passed since the court demanded action, and there are still no protective safeguards for these festering, unlined ponds. EPA is now in clear violation of the court’s

---

<sup>1</sup> EPA, Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals Generated by Electric Utilities, 80 Fed. Reg. 21,302 (Apr. 17, 2015) (“CCR Rule”).

<sup>2</sup> Utility Solid Waste Activities Grp. v. EPA, 901 F.3d 414 (D.C. Cir. 2018) (“USWAG”).

landmark order designed to close the loophole and tackle the cleanup of millions of tons of leaking coal ash.

Further, RCRA requires EPA to review and, if necessary, revise each regulation at least every three years.<sup>3</sup> However, seven years after EPA issued the CCR Rule, the agency has failed to review its dangerous exemption of all inactive landfills and to revise the rule to ensure protection of public health and the environment. EPA is in violation of its statutory duty, and its inaction places hundreds of communities at serious risk of harm. On May 17, 2022, on behalf of six public interest groups, Earthjustice sent a Notice of Intent to Sue EPA over this violation.<sup>4</sup>

### **EPA must strengthen the CCR Rule to protect the nation’s drinking water and surface water**

Across the nation, hundreds of old, leaking, unlined toxic coal ash ponds and landfills are releasing hazardous and radioactive substances and polluting groundwater, bays, lakes, rivers, and streams. Historically, coal plants used the cheapest, easiest – and most dangerous – method of disposal for their toxic waste: dumping it into unlined pits. The older the dump, the more likely the polluter avoided protective measures such as liners, leachate collection, and monitoring wells. These unlined ponds and landfills—containing nearly a billion tons of toxic waste—continue to release hazardous chemicals into our water and risk catastrophic spills. Federal rules requiring their safe closure and cleanup are long overdue.

Based on the utility industry’s own data, 91 percent of regulated coal ash dumps have severely polluted underlying groundwater with hazardous chemicals like arsenic, chromium, cobalt, lead, lithium, and radium to levels exceeding federal safe standards for drinking water.<sup>5</sup> Hundreds of unregulated legacy ponds and inactive landfills are spewing the same hazardous chemicals, albeit with absolutely no cleanup requirements. For example:

- At NIPSCO’s Michigan City Generating Station in Michigan City, Indiana, an unregulated two-million-ton coal ash fill sits precariously behind corroding steel pilings on the shore of Lake Michigan. The toxic fill is leaking arsenic and other hazardous chemicals into the lake as well as into an adjacent creek used for fishing and boating.
- At TVA’s Bull Run Fossil Plant in Clinton, Tennessee, an unlined leaking landfill in use from 1982-2015 is contaminating groundwater with arsenic and boron, but it escapes EPA’s regulations and clean up requirements.

---

<sup>3</sup> 42 U.S.C. § 6912(b).

<sup>4</sup> Clean Power Lake County, Environmental Integrity Project, Hoosier Environmental Council, Indiana State Conference and the Laporte County Branch of the National Association for the Advancement of Colored People, Sierra Club, and Statewide Organizing for Community eMpowerment.

<sup>5</sup> See, Environmental Integrity Project and Earthjustice, Coal’s Poisonous Legacy: Groundwater Contaminated by Coal Ash Across the U.S. (rev. July 11, 2019), <https://environmentalintegrity.org/wp-content/uploads/2019/03/National-Coal-Ash-Report-Revised-7.11.19.pdf>.

- At the Stanton Energy Center in Orlando, Florida, an immense 90-acre coal ash landfill is contaminating groundwater, but the landfill evades all federal requirements because the plant's owner, the Orlando Utilities Commission, stopped disposing of ash just 52 days before the effective date of the 2015 CCR Rule.
- In southeastern Puerto Rico, more than 2 million tons of coal ash was used for structural fill, embankments, and roads. In numerous areas coal ash is now exposed to wind and water near schools, hospitals, and homes, endangering the health of environmental justice communities.
- At Dynegy Midwest Generation's retired Vermilion Power Plant near Oakwood, Illinois, three legacy ash ponds, not explicitly regulated by the CCR Rule, spew toxic leachate into the Middle Fork of the Vermilion River, Illinois' only Wild and Scenic River.

The CCR Rule does not specifically require polluters to monitor the groundwater around the dumps at these and all other legacy coal ash ponds and unregulated landfills. Local residents are kept in the dark about the severity of the water contamination and the safety of their drinking water and water bodies.

### **EPA must act to protect environmental justice communities**

Coal ash pollution is an environmental justice issue. Most coal ash dumps are located in low-income or BIPOC communities where residents suffer higher rates of cancer, asthma, and other adverse health effects, have poor access to health care, and have few or no resources to investigate environmental threats. The Biden administration has repeatedly announced its commitment to environmental justice and must demonstrate this commitment by promptly completing the necessary coal ash rulemakings to ensure environmental justice communities are protected from its toxic threats.

### **Stopping coal ash pollution has widespread support of environmental groups and environmental justice communities**

The undersigned national, regional, and grassroots public interest groups represent hundreds of thousands of Americans concerned about coal ash pollution. While we applaud the EPA's recent actions to crack down on utilities violating the CCR Rule,<sup>6</sup> it is vital for EPA to move further and faster to stop the imminent and continuing threat from legacy ash ponds and unregulated inactive coal ash landfills. Our nation's health and water resources depend on EPA's swift action to comply with the 2018 order of the U.S. Court of Appeals and the statutory requirements under RCRA. We urge you to act quickly and boldly to protect our communities.

---

<sup>6</sup> We strongly support the Biden administration's interim and proposed decisions published on January 11, 2022, marking the first time the EPA cracked down on coal ash contamination. We strongly support the EPA's proposals to require prompt closure of dangerous ponds and applaud the EPA's first-time application of critical CCR Rule requirements, which, if finalized and applied nationwide, will protect communities across the nation from toxic coal ash pollution.

Respectfully submitted,

Timmy Boyle  
Alianza Comunitaria Ambiental del Sureste  
(ACASE)  
[acasepr@gmail.com](mailto:acasepr@gmail.com)  
Humacao, Puerto Rico

Jack West  
Alabama Rivers Alliance  
[jwest@alabamarivers.org](mailto:jwest@alabamarivers.org)  
Birmingham, AL

Mariana Salinas  
American Federation of Government  
Employees Local 3354  
[Peterhugo5@yahoo.com](mailto:Peterhugo5@yahoo.com)  
St. Louis, MO

Myrna Conty  
Amigos del Río Guaynabo  
[gmchg24@gmail.com](mailto:gmchg24@gmail.com)  
Guaynabo, Puerto Rico

Michelle Haverland  
Appalachian Voices  
[mmmercurio@hotmail.com](mailto:mmmercurio@hotmail.com)  
Thorn Hill, TN

Andrew Behar  
As You Sow  
[abehar@asyousow.org](mailto:abehar@asyousow.org)  
Berkeley, CA

Dean Wilson  
Atchafalaya Basinkeeper  
[enapay3@aol.com](mailto:enapay3@aol.com)  
Plaquemine, LA

Eliza Cava  
Audubon Naturalist Society  
[eliza.cava@anshome.org](mailto:eliza.cava@anshome.org)  
Chevy Chase, MD

Charles Scribner  
Black Warrior Riverkeeper  
[cscribner@blackwarriorriver.org](mailto:cscribner@blackwarriorriver.org)  
Birmingham, AL

José Manuel Díaz Pérez  
Campamento Contra las Cenizas en  
Peñuelas  
[noloseus@gmail.com](mailto:noloseus@gmail.com)  
Peñuelas, Puerto Rico

Bill Kornrich  
Care NET  
[Bkornrich@gmail.com](mailto:Bkornrich@gmail.com)  
Sneedville, TN

Gaby Sarri-Tobar  
Center for Biological Diversity  
[gsarritobar@biologicaldiversity.org](mailto:gsarritobar@biologicaldiversity.org)  
Washington, D.C.

Veronica Coptis  
Center for Coalfield Justice  
[veronica@coalfieldjustice.org](mailto:veronica@coalfieldjustice.org)  
Washington, PA

Elizabeth Evans  
Church of Reconciliation  
[emevans500@aol.com](mailto:emevans500@aol.com)  
Carrboro, NC

Mary Ellen DeClue  
Citizens Against Longwall Mining  
[jwdmed@consolidated.net](mailto:jwdmed@consolidated.net)  
Litchfield, IL

Ellen Rendulich  
Citizens Against Ruining the Environment  
[emrrealty@comcast.net](mailto:emrrealty@comcast.net)  
Lockport, IL

Aimee Erickson  
Citizens Coal Council  
[aimee@citizenscoalcouncil.org](mailto:aimee@citizenscoalcouncil.org)  
Washington, PA

Celeste Flores  
Clean Power Lake County  
[Celestef2014@gmail.com](mailto:Celestef2014@gmail.com)  
Waukegan, IL

Curtis Baysinger, M.D.  
Clean Up TVA  
[cbaysinger2@gmail.com](mailto:cbaysinger2@gmail.com)  
Nashville, TN

Jennifer Peters  
Clean Water Action  
[jpeters@cleanwater.org](mailto:jpeters@cleanwater.org)  
Washington, D.C.

Deborah Bahr  
Clean Water Expected in East Tennessee  
Cosby, TN

Amanda Strawderman  
Clean Water for North Carolina  
[amanda@cwfn.org](mailto:amanda@cwfn.org)  
Asheville, NC

Beto Lugo-Martinez  
CleanAirNow  
[betomtz.lugo@gmail.com](mailto:betomtz.lugo@gmail.com)  
Kansas City, KS

Yoca Arditi-Rocha  
CLEO Institute  
[Yoca@CLEOInstitute.org](mailto:Yoca@CLEOInstitute.org)  
Miami, FL

Andrew Payton  
Climate Action Alliance of the Valley  
[contactcaav@gmail.com](mailto:contactcaav@gmail.com)  
Harrisonburg, VA

Bineshi Albert  
Climate Justice Alliance  
[Bineshi@climatejusticealliance.org](mailto:Bineshi@climatejusticealliance.org)  
Tulsa, Oklahoma

Chet Hunt  
Climate Reality Project  
[chunt51@comcast.net](mailto:chunt51@comcast.net)  
Knoxville, TN

Eve Morgenstern  
Climate Reality/Hudson Valley and Catskills  
Chapter  
[evemorgenstern@gmail.com](mailto:evemorgenstern@gmail.com)  
Beacon, NY

Julie Bledsoe  
Coal Ash Workers' Wives  
[juliebledsoe@me.com](mailto:juliebledsoe@me.com)  
Powell, TN

Vernon Haltom  
Coal River Mountain Watch  
[Vernon@crmw.net](mailto:Vernon@crmw.net)  
Naoma, WV

Myrna Conty  
Coalición de Organizaciones Anti  
Incineración  
[gmchg24@gmail.com](mailto:gmchg24@gmail.com)  
San Juan, Puerto Rico

Ruth Santiago  
Comité Diálogo Ambiental, Inc  
[rstgo2@gmail.com](mailto:rstgo2@gmail.com)  
Salinas, PR

Clark Bullard  
Committee on the Middle Fork Vermilion  
[cwbullard3@gmail.com](mailto:cwbullard3@gmail.com)  
Urbana, IL

Penny Dryden  
Community Housing & Empowerment  
Connections Inc.  
[drydenp2015@gmail.com](mailto:drydenp2015@gmail.com)  
Bear, DE

Chad Hoffman  
Coosa Riverkeeper  
[chad@coosariver.org](mailto:chad@coosariver.org)  
Birmingham, AL

Joe Franklin  
Democratic Socialists of America Knoxville,  
TN  
[jgfranklin2010@gmail.com](mailto:jgfranklin2010@gmail.com)  
Knoxville, TN

Robyn Jackson  
Diné C.A.R.E.  
[Robyn.jackson@dine-care.org](mailto:Robyn.jackson@dine-care.org)  
Navajo Nation Territory, AZ, NM, UT

Bobby Jones  
Down East Coal Ash Environmental and  
Social Justice Coalition/Goldsboro  
Resilience Hub  
[bibija@aol.com](mailto:bibija@aol.com)  
Goldsboro, NC

Mary Gutierrez  
Earth Ethics, Inc.  
[earthethicsaction@gmail.com](mailto:earthethicsaction@gmail.com)  
Pensacola, FL

Lisa Evans  
Earthjustice  
[levans@earthjustice.org](mailto:levans@earthjustice.org)  
Marblehead, MA

Bob Jorgensen  
East Peoria Green  
[jestpr@aol.com](mailto:jestpr@aol.com)  
East Peoria, IL

Pam Richart  
Eco-Justice Collaborative  
[prichart@ecojusticecollaborative.org](mailto:prichart@ecojusticecollaborative.org)  
Champaign, IL

Quinn Bieber  
Elevate  
[quinn.bieber@elevatenp.org](mailto:quinn.bieber@elevatenp.org)  
Chicago, IL

Federico Cintrón Moscoso  
El Puente  
[fcintronmoscoso@elpuente.us](mailto:fcintronmoscoso@elpuente.us)  
San Juan, Puerto Rico

Gabrie Melendez  
El Puente de Williamsburg  
[Gmelendezcardona@elpuente.us](mailto:Gmelendezcardona@elpuente.us)  
Salinas, Puerto Rico

John Rumpler  
Environment America Research & Policy  
Center  
[jrumpler@environmentamerica.org](mailto:jrumpler@environmentamerica.org)  
Boston, MA

Jennette Gayer  
Environment Georgia  
[jennette@environmentgeorgia.org](mailto:jennette@environmentgeorgia.org)  
Atlanta, GA

Lisa Hallowell  
Environmental Integrity Project  
[lhallowell@environmentalintegrity.org](mailto:lhallowell@environmentalintegrity.org)  
Washington, D.C.

Ann Mesnikoff  
Environmental Law & Policy Center  
[amesnikoff@elpc.org](mailto:amesnikoff@elpc.org)  
Chicago, IL

Mollie Michel  
Environmental Protection Network  
[mollie.michel@environmentalprotectionnetwork.org](mailto:mollie.michel@environmentalprotectionnetwork.org)  
Washington, D.C.

Lena Mofitt  
Evergreen Action  
[lena@evergreenaction.com](mailto:lena@evergreenaction.com)  
Washington, D.C.

Kenzley Defler  
Fairbanks Climate Action Coalition  
[kenzley@fbxclimateaction.org](mailto:kenzley@fbxclimateaction.org)  
Fairbanks, AK

Cindy Shepherd  
Faith in Place  
[cindy@faithinplace.org](mailto:cindy@faithinplace.org)  
Urbana, IL

R. John Dawes  
Foundation for Pennsylvania Watersheds  
[Rjdawes1@pennsylvaniawatersheds.org](mailto:Rjdawes1@pennsylvaniawatersheds.org)  
Alexandria, PA

Codi Norred  
Georgia Interfaith Power and Light  
[Codi@gipl.org](mailto:Codi@gipl.org)  
Decatur, GA

Kay Ahaus  
Greater Highland Area Concerned Citizens  
[kayahaus@yahoo.com](mailto:kayahaus@yahoo.com)  
Trenton, IL

James M. Redwine  
Harpeth Conservancy  
[jimredwine@harpethriver.org](mailto:jimredwine@harpethriver.org)  
Brentwood, TN

Lynn Nadeau  
HealthLink  
[lynnnadeau@gmail.com](mailto:lynnnadeau@gmail.com)  
<mailto:lynnnadeau@aol.com>  
Salem, MA

Karen Tuddenham  
Healthy Environment Alliance of Utah  
[lexi@healutah.org](mailto:lexi@healutah.org)  
Salt Lake City, UT

Henry S. Cole. PhD  
Henry S. Cole Environmental Associates  
[hcole@hcole-environmental.com](mailto:hcole@hcole-environmental.com)  
Croom, MD

Tim Maloney  
Hoosier Environmental Council  
[tmaloney@hecweb.org](mailto:tmaloney@hecweb.org)  
Indianapolis, IN

Wendy Bredhold  
Indiana Beyond Coal  
[wendy.bredhold@sierraclub.org](mailto:wendy.bredhold@sierraclub.org)  
Evansville, IN

Jennifer Thurston  
Information Network for Responsible  
Mining  
[jennifer@informcolorado.org](mailto:jennifer@informcolorado.org)  
Broomfield, CO

Maria López-Nunez  
Ironbound Community Corporation  
[Mlopeznunez@ironboundcc.org](mailto:Mlopeznunez@ironboundcc.org)  
Newark, NJ

Ashley Williams  
Just Transition Northwest Indiana  
[ashley@jtnwi.org](mailto:ashley@jtnwi.org)  
Michigan City, IN

Patricia Schuba  
Labadie Environmental Organization  
[Prsmail@gmail.com](mailto:Prsmail@gmail.com)  
Labadie, MO

Madeleine Foote  
League of Conservation Voters  
[madeleine\\_foote@lcv.org](mailto:madeleine_foote@lcv.org)  
Washington, D.C.

Dr. Terrie Griffin  
League of Women Voters of Pennsylvania  
[tegriffin.president@palwv.org](mailto:tegriffin.president@palwv.org)  
Harrisburg, PA

Toni Oplt  
Metro East Green Alliance  
[opltocc@ezl.com](mailto:opltocc@ezl.com)  
Alton, IL

Charlotte Jameson  
Michigan Environmental Council  
[charlotte@environmentalcouncil.org](mailto:charlotte@environmentalcouncil.org)  
Lansing, MI

Juan Jhong-Chung  
Michigan Environmental Justice Coalition  
[juan@michiganej.org](mailto:juan@michiganej.org)  
Detroit, MI

Barbara Jennings  
Midwest Coalition for Responsible  
Investment  
[midwest.coalition@yahoo.com](mailto:midwest.coalition@yahoo.com)  
St. Louis, MO

Cheryl Nenn  
Milwaukee Riverkeeper  
[cheryl\\_nenn@milwaukeeriverkeeper.org](mailto:cheryl_nenn@milwaukeeriverkeeper.org)  
Milwaukee, WI

Melissa Vatterott  
Missouri Coalition for the Environment  
[mvatterott@moenvironment.org](mailto:mvatterott@moenvironment.org)  
St. Louis, MO

Cade Kistler  
Mobile Baykeeper  
[ckistler@mobilebaykeeper.org](mailto:ckistler@mobilebaykeeper.org)  
Mobile, AL

Anne Hedges  
Montana Environmental Information Center  
[Ahedges@MEIC.org](mailto:Ahedges@MEIC.org)  
Helena, MT

Julie Mayfield  
MountainTrue  
[julie@mountaintrue.org](mailto:julie@mountaintrue.org)  
Asheville, NC

Maritza Maymí  
MVC  
[maritzamaymi2020@gmail.com](mailto:maritzamaymi2020@gmail.com)  
Caguas, Puerto Rico

Rebecca Hammer  
Natural Resources Defense Council  
[rhammer@nrdc.org](mailto:rhammer@nrdc.org)  
Washington, D.C.

Jodi Lasseter  
NC Climate Justice Collective  
[jodi@ncclimatejustice.info](mailto:jodi@ncclimatejustice.info)  
Durham, NC



Carrie Clark  
North Carolina League of Conservation  
Voters  
[Carrie@nclcv.org](mailto:Carrie@nclcv.org)  
Raleigh, NC

Isabel Geffner  
Neighbors on Call  
[irgeffner@gmail.com](mailto:irgeffner@gmail.com)  
Chapel Hill, NC

Rev. Rodrick Burton  
New Northside Missionary Baptist Church  
[rkburton@msn.com](mailto:rkburton@msn.com)  
St. Louis, MO

Maple Osterbrink  
No Coal UNC  
[maplemaryann@protonmail.com](mailto:maplemaryann@protonmail.com)  
Chapel Hill, NC

Savi Horne  
North Carolina Association of Black Lawyers  
Land Loss Prevention Project  
[savihorne@gmail.com](mailto:savihorne@gmail.com)  
Durham, NC

Belinda Joyner  
Northampton County Concern Citizens  
[joynerjb60@yahoo.com](mailto:joynerjb60@yahoo.com)  
Garysburg, NC

Joanie Kresich  
Northern Plains Resource Council  
[bronya@northernplains.org](mailto:bronya@northernplains.org)  
Billings, MT

Heather Brown  
On a journey with Poorly Differentiated  
Thyroid Cancer in Indiana  
[Heatherbrown04@yahoo.com](mailto:Heatherbrown04@yahoo.com)  
Greenwood, IN

Aleta Toure  
Parable of Sower Intentional Community  
Cooperative  
[withjusticepeace@gmail.com](mailto:withjusticepeace@gmail.com)  
Richmond, CA

Monserate Méndez  
Partido Independentista  
[Monserateramos@gmail.com](mailto:Monserateramos@gmail.com)  
Camuy, Puerto Rico

Shannon Anderson  
Powder River Basin Resource Council  
[sanderson@powderriverbasin.org](mailto:sanderson@powderriverbasin.org)  
Sheridan, WY

Karen Kane  
Prairie Rivers Network  
[Karen.kane@gmail.com](mailto:Karen.kane@gmail.com)  
Champaign, IL

Kristin Camp  
Protect the Middle Fork Citizens Advocacy  
Group  
[kristincorncamp@gmail.com](mailto:kristincorncamp@gmail.com)  
Collison, IL

Vincent Koers  
Protect The Middlefork (Wild & Scenic  
River)  
[Vincekoers@aol.com](mailto:Vincekoers@aol.com)  
Danville, IL

Angel M. Trinidad  
Puerto Rico Libre  
[trotamontes4u@gmail.com](mailto:trotamontes4u@gmail.com)  
Camuy, Puerto Rico

George Matthis  
River Guardian Foundation  
[george@riverguardfdn.org](mailto:george@riverguardfdn.org)  
Raleigh, NC

DeShawn Blanding  
Rural Coalition  
[deshawn@ruralco.org](mailto:deshawn@ruralco.org)  
Washington, D.C.

Susan Wind  
SAFE  
[susan@parentsknowmore.com](mailto:susan@parentsknowmore.com)  
St. Johns, FL

Jonathan Levenshus  
Sierra Club  
[jonathan.levenshus@sierraclub.org](mailto:jonathan.levenshus@sierraclub.org)  
Washington, D.C.

Nicole Saulsberry  
Sierra Club-IL Chapter  
[nicole.saulsberry@sierraclub.org](mailto:nicole.saulsberry@sierraclub.org)  
Springfield, IL

Hernaliz Vazquez  
Sierra Club-PR  
[Hernaliz.Vazquez@sierraclub.org](mailto:Hernaliz.Vazquez@sierraclub.org)  
Puerto Rico

Dr. Cris Corley, Chair  
Sierra Club-Tennessee Chapter  
[drcricorley@gmail.com](mailto:drcricorley@gmail.com)  
Lebanon TN

Barbara J Jennings  
Sisters of St. Joseph of Carondelet  
[midwest.coalition@yahoo.com](mailto:midwest.coalition@yahoo.com)  
St. Louis MO

Frank Holleman  
Southern Environmental Law Center  
[fholleman@selcsc.org](mailto:fholleman@selcsc.org)  
Charlottesville, VA

Suzanne Smith  
Stand Up To Coal  
[suzanne56smith@gmail.com](mailto:suzanne56smith@gmail.com)  
Homer, IL

Isabella Killius  
Sunrise Knoxville  
[sunrisemvmtknoxville@gmail.com](mailto:sunrisemvmtknoxville@gmail.com)  
Knoxville, TN

Alexandra Rodriguez Romero  
Taller Psicologia Social Comunitaria  
Universidad de Puerto Rico  
[tallersocialcomunitario@gmail.com](mailto:tallersocialcomunitario@gmail.com)  
Puerto Rico

Catherine Lutin  
Team Taylor  
[Cstoreylutin@gmail.com](mailto:Cstoreylutin@gmail.com)  
Concord, NC

David Whiteside  
Tennessee Riverkeeper  
[dwhiteside@tennesseeriver.org](mailto:dwhiteside@tennesseeriver.org)  
Decatur, AL

Lyndsay Tarus  
The Alliance for Appalachia  
[Lyndsay@theallianceforappalachia.org](mailto:Lyndsay@theallianceforappalachia.org)  
London, KY

William J. Barber III  
The Climate Reality Project  
[william.barber.iii@climatereality.com](mailto:william.barber.iii@climatereality.com)  
Washington, D.C.

Caroline Armijo  
The Lilies Project  
[Caroline.armijo@gmail.com](mailto:Caroline.armijo@gmail.com)  
Greensboro, NC

Larry Evans  
United Congregations of Metro East  
[evans.larry9@gmail.com](mailto:evans.larry9@gmail.com)  
Glen Carbon, IL

John Blair  
Valley Watch, Inc.  
[Blair@valleywatch.net](mailto:Blair@valleywatch.net)  
Evansville, IN

Vivian Satterfield  
Verde  
[viviansatterfield@verdenw.org](mailto:viviansatterfield@verdenw.org)  
Portland, OR

Patrick Calvert  
Virginia Conservation Network  
[pat@vcnva.org](mailto:pat@vcnva.org)  
Richmond, VA

Chris Leyen  
Virginia League of Conservation Voters  
[cleyen@valcv.org](mailto:cleyen@valcv.org)  
Richmond, VA

Daniel E. Estrin  
Waterkeeper Alliance  
[destrin@waterkeeper.org](mailto:destrin@waterkeeper.org)  
New York, NY

Sara Kendall  
Western Organization of Resource Councils  
[sara@worc.org](mailto:sara@worc.org)  
Billings, MT

Lib Hutchby  
Women's International League for Peace  
and Freedom- Triangle Branch  
[libhutchby5@gmail.com](mailto:libhutchby5@gmail.com)  
Chapel Hill, NC

Kimberly Weaver  
WyCo Mutual Aid  
[kimweaverscott@gmail.com](mailto:kimweaverscott@gmail.com)  
Kansas City, KS

cc: Barry Breen, Acting Assistant Administrator, Office of Land and Emergency Management,  
U.S. Environmental Protection Agency  
Carlton Waterhouse, Deputy Assistant Administrator, Office of Land and Emergency  
Management, U.S. Environmental Protection Agency