March 10, 2020

Submitted via Regulations.gov and via email to fn-ceq-nepa@ceq.eop.gov

Mary B. Neumayr
Chair
Council on Environmental Quality
730 Jackson Place NW
Washington, DC  20503


Dear Ms. Neumayr:

On behalf of our millions of members and supporters across the country, the undersigned **conservation, health, and justice organizations and businesses** urge the Council on Environmental Quality (CEQ) to withdraw the Notice of Proposed Rulemaking (NPRM) and retain the existing CEQ regulations that properly implement the National Environmental Policy Act (NEPA).¹

The deeply flawed and illegal changes in the NPRM would silence public input and purge informed, science-based decision-making from the federal environmental review process. They would put industry, developer, and polluter interests before public health and safety, and before the health of our waters, lands, air and wildlife. The changes create significant risks for frontline and indigenous communities that are already disproportionately harmed by pollution, flooding, and climate change.

NEPA is a critical tool for saving lives and protecting the environment for the health, safety, and well-being of future generations. The existing CEQ regulations correctly implement NEPA’s action forcing procedures that include giving the public a voice in federal decisions that affect the environment, carefully reviewing the environmental impacts of proposed actions, and investigating less environmentally harmful alternative actions. Reviews carried out under the current regulations have exposed the true cost of environmentally damaging and ill-conceived proposals, leading to better solutions and substantial savings for federal taxpayers.²

For example, NEPA review led to an inter-agency agreement halting construction of a dangerous new levee, protecting vulnerable Mississippi River communities from flooding, preventing the loss of 50,000 acres of wetlands, and saving taxpayers more than $345 million. NEPA review of a Corps of Engineers’ proposal to dredge California’s Bolinas Lagoon showed that the project would cause extensive harm to one of the most pristine tidal lagoons in California and was not necessary. The misguided proposal was then abandoned, saving taxpayers $133 million, and the non-federal sponsor developed a community-supported plan to restore and manage the lagoon. NEPA review protected public health and the environment by allowing a coalition of tree planters, rural residents and scientists in the Pacific

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¹ Many of our organizations will also be submitting individual comments and/or joining other group comments urging CEQ to withdraw the NPRM.
² While NEPA implementation has been far from perfect, the information and public involvement obtained through the NEPA process has provided enormous benefits to people, wildlife, and the environment across the country.
Northwest to work with the Forest Service to develop an effective, less-costly, and safer nonchemical weed control alternative in lieu of toxic herbicides.

The changes proposed in the NPRM would unravel the vital protections provided by NEPA, threatening the health, safety, and well-being of people and wildlife across the country. Among many other unacceptable and illegal changes, the NPRM would:

1. **Eliminate NEPA review for many projects:** The proposal attempts to exclude many projects from environmental review and public input under NEPA. Among other things, the NPRM creates new tests for determining whether NEPA applies at all to a project (including by changing the definition of “major federal action”) and allows agencies to exempt a project from NEPA review by determining that some other type of analysis would serve the same purpose. These changes could allow agencies to move forward with controversial projects – including building pipelines, roads, dams, floodgates, and levees – without any NEPA review or opportunity for public comment.

2. **Ignore severe environmental, public safety, and health impacts:** The proposal would severely limit the types of impacts examined during a NEPA review. The NPRM’s directive that analysis of cumulative effects “is not required” would eliminate review of a project’s role in increasing climate change and many other types of harm. It would also dispense with review of rising sea levels, stronger storms, and other climate change impacts on the effectiveness and resilience of a proposed project. Agencies could also ignore many types of severe impacts based on the NPRM’s elimination of all references to “indirect” effects, and its directive to review only impacts with a “reasonably close causal relationship” to the proposed action. These changes could let agencies ignore the long-term impacts of toxic pollution from gold or copper mines; the risks of new levees diverting floodwaters onto other communities; and loss of wetlands caused by reservoir management practices that starve a river of the water flows needed to sustain those wetlands.

3. **Allow projects to be approved even if critical scientific and technical information is missing:** The proposal would give agencies the green light to make decisions without scientific and technical information essential to making a reasoned choice among project alternatives. The NPRM specifically states that agencies “are not required to undertake new scientific and technical research to inform their analyses.” This could let agencies approve navigation infrastructure, major river dredging projects, reservoir operating plans, and large flood projects without conducting the research needed to understand the impacts of those projects on flooding, habitat loss, or ecosystem health.

4. **Significantly weaken the review of alternatives:** The proposal would significantly weaken the assessment of alternatives during a NEPA review, dramatically undermining NEPA’s fundamental purpose of exploring less environmentally harmful approaches to achieving the project purpose. The NPRM eliminates the requirements to “rigorously explore and objectively evaluate all reasonable alternatives” and to consider reasonable alternatives not within the jurisdiction of the lead agency. The NPRM instead directs a much less extensive review, requiring only that agencies “evaluate reasonable alternatives to the proposed action.”
5. **Allow agencies to ignore critical public input:** The proposal creates loopholes that could let federal agencies ignore public comments, effectively silencing the communities and individuals that could be harmed most by a federal action. The NPRM would let agencies ignore public comments that they deem are not “specific” enough or do not include reference to data sources or scientific methodologies. The NPRM improperly places the burden on the public to list *any and all* possible impacts of a proposed project; to provide specific language changes; and to “explain why an issue raised is significant” to the consideration of impacts to the environment, the economy, employment and potential alternatives. Comments most likely to be ignored include those from the general public; those from frontline communities without resources to fund technical reviews; and those that rely on traditional knowledge rather than technical data. The NPRM also creates new hurdles to challenging a flawed environmental review in court.

6. **Allow project applicants to write their own environmental reviews without conflict of interest safeguards:** The proposal eliminates longstanding safeguards designed to protect the independence and integrity of environmental reviews. Under the current regulations, the federal agencies prepare NEPA reviews and agencies can only hire consultants to assist in a NEPA review after obtaining disclosures of any conflicts of interest or financial stakes in the project the contractor would be reviewing. The NPRM, however, lets companies prepare their own NEPA reviews—despite their clear interest in obtaining project approval. Agencies could also hire contractors without obtaining a conflicts of interest disclosure.

The changes proposed in the NPRM would wreak havoc on communities, wildlife, and the environment. We urge CEQ to withdraw the NPRM and retain the existing NEPA implementing regulations that have properly served the nation for more than 40 years.

Sincerely,

Bo Webb  
Campaign Director  
ACHE

Cindy E Lowry  
Executive Director  
Alabama Rivers Alliance

Maria De Luna  
National Policy & Advocacy Coordinator  
Alianza Nacional de Campesinas

Susan Inman  
Altamaha Coastkeeper  
Altamaha Coastkeeper

Steve Holmer  
Vice President of Policy  
American Bird Conservancy

Don Riepe  
Director, NE Chapter  
American Littoral Society

Katherine Robb  
Senior Program Manager  
American Public Health Association

Eileen Shader  
Director, River Restoration  
American Rivers

Joseph Zupan  
Executive Director  
Amigos Bravos

Thomas Anderson  
Administrative Director  
Amigos De Bolsa Chica
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Trey Sherard
Interim Riverkeeper
Anacostia Riverkeeper

Olivia Anderson
Project Coordinator and Development Lead
Anacostia Riverkeeper Inc.

Marjorie Levine
Director
Angler Action Foundation

Bethany Cotton
Terrestrial Wildlife Director
Animal Welfare Institute

Georgia Ackerman
Riverkeeper & Executive Director
Apalachicola Riverkeeper

Mary Varson Cromer
Deputy Director
Appalachian Citizens' Law Center, Inc.

Joe Lovett
Executive Director
Appalachian Mountain Advocates

Brendan Mysliwiec
Director of Federal Policy and Legislation
Appalachian Trail Conservancy

Jim Vogt
President
Aquashicola/Pohopoco Watershed Conservancy

Francisco Lopez
President
Arrecifes Pro Ciudad Inc.

Constantino Aucca
President of ECOAN
Asociacion Ecosistemas Andinos - ECOAN

Kathy Phillips
Assateague COASTKEEPER
Assateague Coastal Trust

Dean A. Wilson
Executive Director
Atchafalaya Basinkeeper

Heather Cantino
Steering Committee Chair
Athens County’s Future Action Network, a.k.a. Athens County (OH) Fracking Action Network

Scott Zucker
Vice President
Audubon Everglades

Jill Mastrototaro
Policy Director
Audubon Mississippi

Dan VanNorman
President of Audubon Chapter and Alternate Delegate to the Everglades Coalition
Audubon of Southwest Florida

Connie M. Ericson
Advocacy Chair
Audubon Society Northern Virginia

Bob Sallinger
Conservation Director
Audubon Society of Portland

Kevin Graff
Vice-President
Baltimore Bird Club

Kevin Emmerich
Director
Basin and Range Watch

Jordan Macha
Executive Director & Waterkeeper
Bayou City Waterkeeper
Bob Fisher
Communications Chair
Bird Conservation Network

Charles Scribner
Executive Director
Black Warrior Riverkeeper

David C Perry
Executive Director
Blue Ridge Land Conservancy and Central Virginia Land Conservancy

Jenn Aiosa
Executive Director
Blue Water Baltimore

Rebecca Roter
Chairperson
Breathe Easy Susquehanna County

Beth K. Stewart
Executive Director
Cahaba River Society

Myra A Crawford
Executive Director
Cahaba Riverkeeper

Sean Bothwell
Executive Director
California Coastkeeper Alliance

Nick Jensen
Lead Conservation Scientist
California Native Plant Society

Bill Jennings
Executive Director
California Sportfishing Protection Alliance

Linda Castro
Assistant Policy Director
California Wilderness Coalition

Michael J. Painter
Coordinator
Californians for Western Wilderness

John Cassani
Calusa Waterkeeper
Calusa Waterkeeper

Lori Haus-Bulcock
Board of Directors
Cape Coral Friends of Wildlife

Kemp Burdette
Cape Fear Riverkeeper
Cape Fear River Watch

Parker Agelasto
Executive Director
Capital Region Land Conservancy

Glenn Wahl
Co-Founder
Cattaraugus-Chautauqua for Clean Water

David C. Kyler
Co-Director
Center for a Sustainable Coast

Joe Laszlo
Facilitator
Central Illinois Healthy Community Alliance

Reed Perry
Government Relations Specialist
Chesapeake Conservancy

Judy Pollock
President
Chicago Audubon Society

Michael William Mullen
Riverkeeper/Executive Director
Choctawhatchee Riverkeeper

John Koeferl
President
Citizens Against Widening the Industrial Canal

Aimee Erickson
Executive Director
Citizens Coal Council
Natasha Leger
Executive Director
Citizens for a Healthy Community

Anne Coglianese
Coastal Resilience Program Manager
City of New Orleans

Jennifer Peters
National Water Programs Director
Clean Water Action

Ken Dolsky
Organizer
Coalition Against Pilgrim Pipeline - NJ

Emily Vuxton
Policy Director
Coalition to Restore Coastal Louisiana

Bayard Ewing
Chair, Conservation Committee
Colorado Native Plant Society

Brett VandenHuevel
Executive Director
Columbia Riverkeeper

Clark Bullard
Director
Committee on the Middle Fork Vermilion River

Brigid Lawlor
U.S. Provinces Advocacy Liaison
Congregation of Our Lady of the Good Shepherd, U.S. Provinces

Heather A. Govern, Esq.
Vice President and Director, Clean Air and Water Program
Conservation Law Foundation (CLF)

Jesse Demonbreun-Chapman
Executive Director & Riverkeeper
Coosa River Basin Initiative/Upper Coosa Riverkeeper

Larry Baldwin
Waterkeeper
Crystal Coast Waterkeeper

William Franks
President
Cumberland-Harpeth Audubon Society

Peg Furshong
Director of Programs
CURE (Clean Up the River Environment)

Frank James
Staff Director
Dakota Rural Action

John Murtaugh
Representative, Rockies and Plains
Defenders of Wildlife

Diane Rosencrance
Executive Director
Delaware Highlands Conservancy

Matthew Sarver
Conservation Chair
Delaware Ornithological Society

Maya K. van Rossum
the Delaware Riverkeeper
Delaware Riverkeeper Network

Anne Bekker
Conservation Co-Chair
Delaware Valley Ornithological Club

Angelo DePaola
Owner and operator
Depe Oysters LLC

Babak Tondre
President & Co-Owner
DIG Cooperative Inc.

Mary Gutierrez
Director
Earth Ethics, Inc.
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Amy Rosmarin
Executive Director
Earthkeeper Health Resources

Aaron Mintzes
Senior Policy Counsel
Earthworks

Daneeta Loretta Jackson
Producer
Elektrik Zoo Films, Inc.

Dan Silver
Executive Director
Endangered Habitats League

Morgan Patton
Executive Director
Environmental Action Committee of West Marin

Maureen Cunningham
Senior Director for Clean Water
Environmental Advocates of New York

Caitlin Hart
Senior Legislative Analyst
Environmental Defense Fund

Thomas Wheeler
Executive Director
Environmental Protection Information Center

Michelle Roos
Executive Director
Environmental Protection Network

Steve Box
Executive Director
Environmental Stewardship

Jim La Rochelle
President
Evanston North Shore Bird Club

Carol Hoover / Skye Steritz
Executive Director / Program Manager
Eyak Preservation Council / Copper River Delta Sound Waterkeeper

Blair Schilling
Attorney
Fishman Haygood, LLP

Bill Tanger
Vice President and Conservation Chair
Float Fishermen of Virginia

Emma Haydocy
Director
Florida Bay Forever

Michael Chenoweth
President
Florida Division of the Izaak Walton League of America

Mark Perry
Executive Director
Florida Oceanographic Society

Liz Kirkwood
Executive Director
FLOW (For Love of Water)

Dave Peterson
Conservation Chair
Fly Fishers International

Sherry Pease
Executive Director
Foothill Conservancy

Spring D Ligi
Nature Instructor
Frederick Bird Club - MOS

Judith Rodd
Director
Friends of Blackwater, Inc.
Ivy Frignoca
Casco Baykeeper
Friends of Casco Bay

Glenda Booth
President
Friends of Dyke Marsh

Andrew N Tyler
Consultant
Friends of Fakahatchee

Kevin Chapdelaine
President
Friends of Pool 2

Scott Beauchamp
Policy Director
Friends of the BWCA

Bob Clarke
President
Friends of the Central Sands

Amanda Pitzer
Executive Director
Friends of the Cheat

Jim Pfiffer
Executive Director
Friends of the Chemung River Watershed

Kristin Larsen
Executive Director
Friends of the Cloquet Valley State Forest

Robert Burns
Detroit Riverkeeper
Friends of the Detroit River

Marcie Keever
Director, Oceans & Vessels Program
Friends of the Earth

Barbara Ullian
Chair
Friends of the Kalmiopsis

Dawn Buehler
Kansas Riverkeeper & Executive Director
Friends of the Kaw

John C McCue
Chairman
Friends of the Middle River

Trevor A Russell
Water Program Director
Friends of the Mississippi River

Scott C Yaich
Board Member
Friends of the North Fork and White Rivers

Ronald Martin Stork
Policy Director
Friends of the River

Bill Tanger
Chair
Friends of the Rivers of Virginia

Kathleen J. Vasvary
Missionary
Friends of the Santa Cruz River

Bob Stokes
President
Galveston Bay Foundation

Yvonne Taylor
Vice President
Gas Free Seneca

Peter Duffey
Board Director
George's River Land Trust

Michael Worley
President & CEO
Georgia Wildlife Federation

Linda Stone
VP Admin & Gulf Coast Programs
Global Green
Rachael Thompson  
Executive Director  
**Glynn Environmental Coalition**

Pam Young  
Executive Director  
**Golden Gate Audubon Society**

Rick Eichstaedt  
Director/Attorney  
**Gonzaga University Environmental Law and Land Use Clinic**

Fred Akers  
Administrator  
**Great Egg Harbor Watershed Association**

Shelley Silbert  
Executive Director  
**Great Old Broads for Wilderness**

Bruce A. Morrison  
President  
**Great Rivers Environmental Law Center**

David Stokes  
Executive Director  
**Great Rivers Habitat Alliance**

Veronica Warnock  
Conservation Director  
**Greater Hells Canyon Council**

Fran Teplitz  
Executive Co-director  
**Green America**

Sascha Bollag  
Attorney  
**Green Justice**

Charlie Cray  
Business and Political Strategist  
**Greenpeace**

Theaux Le Gardeur  
Gunpowder RIVERKEEPER  
**Gunpowder RIVERKEEPER**

Captain Bill Sheehan  
Riverkeeper & Executive Director  
**Hackensack Riverkeeper**

Emily Sutton  
Haw Riverkeeper  
**Haw River Assembly**

Sean Grace  
President  
**Hawk Mountain Sanctuary**

Cynthia Sarthou  
Executive Director  
**Healthy Gulf (formerly Gulf Restoration Network)**

April Peebler  
Executive Director  
**Heirs To Our Oceans**

Stephen Buczynski  
President  
**Hendry-Glades Audubon Society**

Matt Reed  
Public Lands Director  
**High Country Conservation Advocates**

Patricia Adams  
Attorney  
**Holy Cross Neighborhood Association**

Indra Frank  
Director of Environmental Health and Water Policy  
**Hoosier Environmental Council**

Aaron Lehmer-Chang  
Co-owner  
**House Kombucha**
Richard Webster  
Legal Director  
**Hudson Riverkeeper**

Jennifer Kalt  
Director  
**Humboldt Baykeeper**

Colleen McNally-Murphy  
Associate National Director  
**Hydropower Reform Coalition**

Nic Nelson  
Executive Director  
**Idaho Rivers United**

Bonnie Duman  
Board Member  
**Illinois Audubon Society**

Edward L Michael  
Government Affairs Chair  
**Illinois Council of Trout Unlimited**

Tamima Itani  
Vice President and Treasurer  
**Illinois Ornithological Society**

Liz Stelk  
Executive Director  
**Illinois Stewardship Alliance**

Howdy Henritz  
President  
**Indian Creek Watershed Association**

Michael Conner  
Executive Director  
**Indian Riverkeeper**

Emily A Wood  
Executive Director  
**Indiana Wildlife Federation**

Megan Brousseau  
Associate Director  
**Inland Empire Waterkeeper**

Vicki Nichols Goldstein  
Founder & Director  
**Inland Ocean Coalition**

Shiney Varghese  
Senior Policy Analyst  
**Institute for Agriculture and Trade Policy**

Michael R. Schmidt  
Staff Attorney  
**Iowa Environmental Council**

Joe Wilkinson  
President  
**Iowa Wildlife Federation**

Jared Mott  
Conservation Director  
**Izaak Walton League of America**

Jim Scheff  
Director  
**Kentucky Heartwood**

Tom Fitzgerald  
Director  
**Kentucky Resources Council**

Pat Banks  
Director  
**Kentucky Riverkeeper**

Ward G. Wilson  
Executive Director  
**Kentucky Waterways Alliance**

Kimberly Baker  
Executive Director  
**Klamath Forest Alliance**

Joseph Vaile  
Climate Program Director  
**Klamath-Siskiyou Wildlands Center**

Patricia Schuba  
President  
**Labadie Environmental Organization (LEO)**
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Lori Fisher
Executive Director
Lake Champlain Committee

Sandy Bihn
Executive Director
Lake Erie Waterkeeper

Reinaldo Diaz
Waterkeeper
Lake Worth Waterkeeper

Rena Cohen
President
Lake-Cook Chapter, Illinois Audubon Society

Cindy Brown
Executive Director
Land Trust for Louisiana

Deborah A Aldridge
President
Last Stand

Rebecca Jim
Tar Creekkeeper
LEAD Agency, Inc.

Matthew Davis
Legislative Director
League of Conservation Voters

Nancy Porter
Director
League of Women Voters of Iowa

Cathy Eisenhofer
President
League of Women Voters of Johnson County Iowa

Jessica Jones Capparell
Legislative and Policy Affairs Senior Manager
League of Women Voters of the United States

Mary Ploeser
Co-Chair
League of Women Voters Upper Mississippi River Region Inter League Organization (LMVURRILO)

Sandy Rosenthal
Founder and President
Levees.org

Angela Shugart
Executive Director
Little River Waterkeeper

John Weisheit
Conservation Director
Living Rivers & Colorado Riverkeeper

Michael Myers
Executive Director
Loudoun Wildlife Conservancy

Dr. Barry Kohl
President
Louisiana Audubon Council

John A. Ruskey
Founding Director
Lower Mississippi River Foundation

Ted Evgeniadis
Lower Susquehanna Riverkeeper
Lower Susquehanna Riverkeeper Association

Laura Paul
Executive Director
lowernine.org

Drew Martin
Conservation Chair
Loxahatchee Group

Karen Forget
Executive Director
Lynnhaven River NOW
Laura Daniel Davis  
Chief of Policy and Advocacy  
**National Wildlife Federation**

Veronica Bowers  
Director  
**Native Songbird Care & Conservation**

Diana and Byron Steskal  
Nebraska Landowners  
**Nebraska Easement Action Team (NEAT)**

George Cunningham  
Board Member  
**Nebraska Wildlife Federation**

Elliott Ruga  
Policy & Communications Director  
**New Jersey Highlands Coalition**

Susan Michelle Silber  
Director  
**NorCal Resilience Network**

Carrie Clark  
Executive Director  
**North Carolina League of Conservation Voters**

Matt Norton  
Policy Director  
**Northeastern Minnesotans for Wilderness**

Michael J. Goff  
President and CEO  
**Northeast-Midwest Institute**

Nina Bell  
Executive Director  
**Northwest Environmental Advocates**

Jonah Sandford  
Staff Attorney  
**Northwest Environmental Defense Center**

Gregory Remaud  
Baykeeper & CEO  
**NY/NJ Baykeeper**

William Rossiter  
Vice President  
**NY4WHALES**

Kathryn Heintz  
Executive Director  
**NYC Audubon**

Michael Stocker  
Director  
**Ocean Conservation Research**

Courtney Vail  
Director of Strategic Campaigns  
**Oceanic Preservation Society**

Damon Mullis  
Executive Director/Riverkeeper  
**Ogeechee Riverkeeper**

Rich Cogen  
Executive Director  
**Ohio River Foundation**

Jackie Antalan  
Director of Outreach & Programs  
**Operation HomeCare**

Mark Salvo  
Program Director  
**Oregon Natural Desert Association**

Doug Heiken  
Conservation and Restoration Coordinator  
**Oregon Wild**

J. Sam Miller  
Organizer  
**Our Water, Our Air, Our Rights**

Vivian Stockman  
Executive Director  
**OVEC-Ohio Valley Environmental Coalition**

Brenda Curtis  
Board Member & Conservation Chair  
**Peace River Audubon**
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Rev. Sandra L. Strauss
Director of Advocacy and Ecumenical Outreach
Pennsylvania Council of Churches

Howard Penn
Executive Director
Planning and Conservation League

Pat Lupo, OSB and Sarah Peelman
Co-chairs
PLEWA, Pennsylvania Lake Erie Watershed Association

Peter Hudiburg
Founder
Plymouth Friends for Clean Water

Phillip Musegaas
Vice President of Programs and Litigation
Potomac Riverkeeper Network

Marcia Westkott
Chair
Powder River Basin Resource Council

Nancy Hilding
President
Prairie Hills Audubon Society of Western South Dakota

Ryan Grosso
Water Resources Associate
Prairie Rivers Network

Roseanna Sacco
President
Preserve Monroe

Lucia Bogatay
President
Presidio Historical Association

Alyssa Barton
Policy Manager
Puget Soundkeeper

Joe Siegrist
President/CEO
Purple Martin Conservation Association

John Ruskey
Owner, Founder
Quapaw Canoe Company

Tom Sobal
Director
Quiet Use Coalition

Phil Irwin
Vice President
Rappahannock League for Environmental Protection

Bill Shultz
Raritan Riverkeeper
Raritan Riverkeeper

Eleanor Hines
North Sound Baykeeper
RE Sources for Sustainable Communities

Marianne Cufone
Executive Director
Recirculating Farms Coalition

Jen Pelz
Rio Grande Waterkeeper
Rio Grande Waterkeeper (WildEarth Guardians)

Lisa Wittenborn
Program Director
Rivanna Conservation Alliance

Raj Shukla
Executive Director
River Alliance of Wisconsin

Katherine Baer
Director of Science and Policy
River Network
Barbara L. Walsh  
Executive Director  
**Rockbridge Area Conservation Council (RACC)**

Roz McClellan  
Coordinator  
**Rocky Mountain Recreation Initiative**

Stacey Detwiler  
Conservation Director  
**Rogue Riverkeeper**

Don McEnhill  
Executive Director  
**Russian Riverkeeper**

Trygve B. Sletteland  
Founder and Executive Director  
**Sacramento River Council (subsumed into Sacramento River Preservation Trust)**

David Harrison  
Conservation Director  
**Salem Audubon Society**

Diane Wilson  
Executive Director  
**San Antonio Bay Estuarine Waterkeeper**

Sejal Choksi-Chugh  
Executive Director  
**San Francisco Baykeeper**

Christine Canaly  
Director  
**San Luis Valley Ecosystem Council**

Gail Musante  
official signer  
**Sanford-Oquaga Area Concerned Citizens (S-OACC)**

Laura Early  
Executive Director  
**Satilla Riverkeeper**

Tonya Bonitatibus  
Riverkeeper  
**Savannah Riverkeeper/Waterkeeper**

Carol Campbell  
Member  
**Save EPA**

Joseph Bogaard  
Executive Director  
**Save Our Wild Salmon Coalition**

Kate McPherson  
Narragansett Bay Riverkeeper  
**Save the Bay**

Michael Rice  
Director  
**Save the Cape, Inc.**

Gary Wockner  
Executive Director  
**Save The Colorado**

Kay Charter  
Executive Director  
**Saving Birds Thru Habitat**

Joseph Campbell  
President  
**Seneca Lake Guardian, A Waterkeeper Affiliate**

Matt Pluta  
Choptank Riverkeeper  
**ShoreRivers**

Dalal Aboulhosn  
Deputy Legislative Director  
**Sierra Club**

Carol Adams-Davis  
Vice Chair  
**Sierra Club Mobile Bay Group**

Sandra Seberger  
Chairman  
**Sierra Club-Black Hills**
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Charles Marsh
President
Sleepy Creek Watershed Association
Snake River Waterkeeper
Executive Director
Snake River Waterkeeper
Dave Willis
Chair
Soda Mountain Wilderness Council
Laura Sue Fuderer
Conservation Chair
South Bend-Elkhart Audubon Society
Brad K. Evans
Waterkeeper
South Platte River Waterkeeper
Bob Lukinic
Conservation Chair
Southern Maryland Audubon Society
Sharon Yoker
Secretary of TriLakes Fly Fishers
Southwest Missouri Fly Fishers
Lisa Rinaman
Riverkeeper
St. Johns Riverkeeper
Suzannah Glidden
Co-founder
Stop the Algonquin Pipeline Expansion (SAPE)
Andre Mele
Executive Director
Suncoast Waterkeeper
Angela Howe
Legal Director
Surfrider Foundation
Justin Bloom
Director
Tampa Bay Waterkeeper

Kathy Hawes
Executive Director
Tennessee Clean Water Network
David Whiteside
Executive Director
Tennessee Riverkeeper
Rhiannon Lewis-Stephenson
Communications and Development Coordinator
The Environmental Protection Information Center (EPIC)
Barbara Heskins Davis
Vice President Programs
The Land Conservancy of New Jersey
Mike Petersen
Executive Director
The Lands Council
Steve Shimek
Executive Director
The Otter Project and Monterey Coastkeeper
Heather Smith
Grand Traverse Baykeeper
The Watershed Grand Traverse Bay
Ann Witsil
Interim Executive Director
The Wetlands Conservancy
Paul Botts
President & Executive Director
The Wetlands Initiative
Drew McConville
Sr. Managing Director, Government Relations
The Wilderness Society
Richard McNutyt
President
Tidewaters Gateway Partnership Inc.
Jennifer Mckay
Policy Director
Tip of the Mitt Watershed Council
Ashley Short  
Riverkeeper & In-House Counsel  
**Tualatin Riverkeepers**

Sandra Schubert  
Executive Director  
**Tuleyome**

Lee First  
Twin Harbors Waterkeeper  
**Twin Harbors Waterkeeper**

Richard M Frank  
Professor of Environmental Practice  
**U.C. Davis School of Law**

Andrew Rosenberg  
Director, Center for Science and Democracy  
**Union of Concerned Scientists**

Guy Alsentzer  
Executive Director  
**Upper Missouri Waterkeeper**

Mary Rafferty  
Executive Director  
**Virginia Conservation Network**

Christina Hausman Rhode  
Executive Director  
**Voyageurs National Park Association**

David Groenfeldt, PhD  
Director  
**Water-Culture Institute**

Betsy Nicholas  
Executive Director  
**Waterkeepers Chesapeake**

Jen Lomberk, Esq.  
Vice Chair, Waterkeepers Florida  
**Waterkeepers Florida**

Rhiannon Tereari'i Chandler-'Iao  
Executive Director  
**Waterkeepers Hawaiian Islands**

Angie Rosser  
Executive Director  
**West Virginia Rivers Coalition**

Troy Redding  
Community Organizer  
**Western Colorado Alliance**

Barbara Vasquez  
Oil and Gas Chair  
**Western Organization of Resource Councils**

Larry Baldwin  
Advocacy Director  
**White Oak-New Riverkeeper Alliance**

Jeremy Nichols  
Climate and Energy Program Director  
**WildEarth Guardians**

Christine Ellis  
Executive Director  
**Winyah Rivers Alliance**

Julie E Wille  
Co-founder of Women for Wild Lands  
**Women for Wild Lands**

Edgar Miller  
Executive Director  
**Yadkin Riverkeeper**

Emma Reisinger  
Gardener, Organization President  
**Yellow House Farm**

Melinda Booth  
Executive Director and Waterkeeper  
**Yuba River Waterkeeper**