

African American Environmentalist Association ▪ American Lung Association ▪ American Rivers ▪ Buckeye Environmental Network ▪ Butte Environmental Council ▪ California Environmental Rights Alliance ▪ California Safe Schools ▪ Center on Race, Poverty and the Environment ▪ Clean Air Task Force ▪ Clean Water Action/Clean Water Fund ▪ Coalition for Clean Air ▪ Coalition for a Safe Environment ▪ Communities for a Better Environment ▪ Community Coalition for Change ▪ Environmental Defense ▪ Environmental Health Coalition ▪ Environmental Health Fund ▪ Eileen Gauna, Esq., Professor at Southwestern School of Law ▪ Greenaction for Health and Environmental Justice ▪ Latino Issues Forum ▪ Vernice Miller-Travis ▪ NAACP Legal Defense and Educational Fund, Inc. ▪ National Hispanic Environmental Council ▪ National Refinery Reform Campaign ▪ Natural Resources Defense Council ▪ New York City Environmental Justice Alliance ▪ New York Lawyers for Public Interest ▪ Ohio Valley Environmental Coalition ▪ Oil and Gas Accountability Project ▪ Our Children's Earth ▪ People Organizing to Demand Environmental and Economic Rights ▪ Physicians for Social Responsibility ▪ Public Citizen ▪ Public Trust Alliance ▪ Regional Asthma Management and Prevention Initiative ▪ Sciencecorps.org ▪ Southern Environmental Law Center ▪ Southwest Network for Environmental and Economic Justice ▪ Tri-State Environmental Council ▪ UPROSE ▪ West Harlem Environmental Action, Inc. ▪ West Oakland Environmental Indicators Project

---

July 15, 2005

Mr. Barry E. Hill  
Director, Office of Environmental Justice  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW, Mail Code 2201A  
Ariel Rios South Building, Room 2226  
Washington, DC 20460-0001

**RE: Comments on U.S. EPA's Draft Environmental Justice Strategic Plan Framework and Outline**

Dear Mr. Hill:

The undersigned organizations respectfully submit comments on EPA's *Environmental Justice Strategic Plan Framework and Outline* (the "Draft Framework/Outline").<sup>1</sup>

As indicated by EPA, the Draft Framework/Outline is intended to be the foundation of the Agency's Environmental Justice Strategic Plan ("EJ Strategic Plan") for 2006-2011. We understand that the EJ Strategic Plan is being developed pursuant to the requirements of Executive Order 12,898 ("Executive Order"), issued in 1994, which requires all federal agencies to develop and implement policies, strategies, programs, and activities to address environmental justice.<sup>2</sup> EPA has indicated that the Draft Framework/Outline is the first step to identifying the key elements of the EJ Strategic

---

<sup>1</sup> See EPA Environmental Justice Strategic Plan Framework and Outline (Working Draft), 70 Fed. Reg. 36167 (June 22, 2005) ("Strategic Plan").

<sup>2</sup> See generally Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Exec. Order No. 12,898, 3 C.F.R. 859 (1995), *reprinted as amended* in 42 U.S.C. §4321 (1994 & Supp. VI 1998) (the "Executive Order").

Plan that will help the Agency track progress and benchmark its environmental justice objectives. It cannot be overstated how important this document will be for the Agency's efforts to successfully comply with the requirements of the Executive Order, and more importantly, to achieve environmental justice in communities disproportionately impacted by toxic pollution.

Although we commend EPA for taking this first important step towards developing a primary environmental justice planning instrument, we strongly object to the Agency's overall premise that environmental justice applies to "everyone," instead of specifically to disproportionately impacted low-income communities of color. Eliminating "race" and "income" as the focus of environmental justice efforts is the wrong course to set when planning for the Agency's future work in this area.

We were disappointed about the short amount of time allotted for the public to comment on this important document. Achieving environmental justice requires an inclusive participatory approach, giving impacted communities ample time, resources, and information to meaningfully participate in the decision- and policy-making process. The fifteen business day public comment period for this document contradicts the National Environmental Justice Advisory Council's own "Model Plan for Public Participation," which was developed in 1995, and has been widely accepted and utilized by EPA and other federal agencies in the intervening decade since it was first adopted by EPA.

We believe the Draft Framework/Outline, absent of a commitment to specifically address these disproportionately impacted populations, will not only paralyze long-standing policies meant to protect society's least advantaged against the health and economic effects of unjust environmental burdens, but also fails to fulfill the expressed intent and requirements of the Executive Order.<sup>3</sup>

Justice may be blind, but it should not turn a blind eye to the injustices done to these communities for so many years. People of color and low-income families live next door to more polluters than anyone else in our country. Industrial facilities are frequently built in low-income neighborhoods, leaving residents to live, work, and play near power plants, garbage dumps, and toxic waste sites. As you are aware, many low-income and communities of color already have significant health vulnerabilities because of poverty, lack of access to adequate health care, and occupational exposures. The addition of poor environmental protection and enforcement to existing health vulnerabilities has only exacerbated the conditions in these communities, who often suffer from higher rates of illness and death in comparison with middle-class suburban and more affluent communities. These disproportionate impacts are the essence of what environmental justice stands for and seeks to correct.

This letter outlines our basic objections to the Draft Framework/Outline and provides detailed suggestions on what EPA can do to strengthen it.

---

<sup>3</sup> *Id.*

## **I. Importance of Specifically Focusing on Disproportionately Impacted Low-Income Communities of Color When Addressing Environmental Justice Problems**

The Executive Order recognized that environmental justice cannot be achieved in our nation unless federal agencies develop programs, policies, and activities specifically targeted to ensure that low-income communities of color are no longer subjected to disproportionately high levels of environmental risk and illness.<sup>4</sup> By doing so, the Executive Order sought to rectify the long history of environmental injustices in these communities.

Championed primarily by African-Americans, Latinos, and Asian and Pacific Islanders in large cities and small rural towns, and by Native Americans on tribal lands, the environmental justice movement addresses a statistical fact: people who live, work, and play in America's most polluted environments are most often people of color and the poor.<sup>5</sup> Environmental justice advocates have shown that this is no coincidence: communities of color and low-income communities are often forced to host facilities that bring negative environmental impacts.

As demonstrated by a wealth of studies, and by EPA's own admission, race and class clearly play significant roles in environmental decision-making – resulting in these communities being disproportionately affected by siting decisions and the permitting of facilities.<sup>6</sup> In addition, it is clear that low-income communities of color are most often exposed to multiple pollutants from multiple sources.<sup>7</sup> Unfortunately, there continues to be insufficient data collection and scientific research done to clearly identify the health implications of multiple exposures.

The landmark report of the United Church of Christ's Commission for Racial Justice ("Commission for Racial Justice") identified some key tools that can improve how communities respond to environmental justice. The report identified access to information, including data and scientific research, as particularly critical for

---

<sup>4</sup> *Id.* at §§ 1-101, 3-3, and 4-401.

<sup>5</sup> See U.S. General Accounting Office, *Siting Hazardous Waste Landfills and Their Correlation with Racial and Economic Status of Surrounding Communities*, June 1983; United Church of Christ, Commission for Racial Justice, *Toxic Wastes and Race in the United States: A National Report on the Racial and Socioeconomic Characteristics of Communities with Hazardous Waste Sites*, 1987, pp. xiii, 13-21 ("UCC Report"); and Benjamin A. Goldman and Laura Fitton, *Toxic Wastes and Race Revisited: An Update of the 1987 Report on the Racial and Socioeconomic Characteristics of Communities with Hazardous Waste Sites* (Center for Policy Alternatives and the United Church of Christ, Commission for Racial Justice, 1994), pp. 2-4; and Luke W. Cole and Sheila R. Foster, *From the Ground Up: Environmental Racism and the Rise of Environmental Justice Movement* (New York University Press, 2001), pp. 54-55, 167-83.

<sup>6</sup> *Id.* EPA's Office of Environmental Justice has testified that "at least 76-90 studies have consistently said that minorities and low-income communities are disproportionately exposed to environmental harms and risks" (Barry Hill, Director, Office of Environmental Justice, U.S. EPA, testimony before the U.S. Commission on Civil Rights, hearing, Washington, D.C., February 8, 2002, official transcript, p. 48).

<sup>7</sup> *Id. supra* note 5.

communities disproportionately and adversely affected by environmental decision-making.<sup>8</sup> In addition, the Commission for Racial Justice reported that “institutional resistance to providing information is likely to be greater when agencies are confronted by groups, such as those among racial and ethnic communities and the poor, who are perceived to wield less political clout.”<sup>9</sup>

To address this “institutional resistance,” the Executive Order required federal agencies to adopt key tools in order to address environmental justice issues. Some of these tools included the following:<sup>10</sup>

1. to gather data and conduct research to identify and address the disproportionately high and adverse human health, environmental, social, and economic effects of agency programs and policies on communities of color and low-income; and
2. requiring that agencies develop policies, programs, procedures, and activities to ensure that these specific impacted communities are meaningfully involved in environmental decision-making.

These tools recognized historical inequities in the distribution of toxic pollution in impacted communities, and sought to provide assistance, policies, and programs to address these inequities. In other words, the Executive Order officially recognized that without federal intervention, environmental justice in impacted communities could not be achieved.

## **II. Draft Framework/Outline Fails to Implement the Intent and Requirements of Executive Order**

The Draft Framework/Outline indicates it is attempting to provide environmental justice for “everyone,” a significant departure from existing environmental justice policy as implemented by EPA, regional offices, other federal agencies, states, and localities. While “justice for all” is a laudable goal worth pursuing that is consistent with EPA’s overall mission statement, it does not specifically address the Executive Order’s expressed requirement of “identifying disproportionately high and adverse human health or environmental effects on minority populations and low-income populations.”<sup>11</sup>

We believe this crucial premise in the Draft Framework/Outline is not isolated, but part of a recent attempt by EPA to reinterpret the Executive Order’s mandate and to shirk its responsibilities to directly address Environmental Justice. It is well known that industry has long held the view that the Executive Order and Title VI of the Civil Rights Act of 1964 impose unnecessary restrictions on industry, especially in the permitting

---

<sup>8</sup> See UCC Report *supra* note 5 at pp. 6-7.

<sup>9</sup> *Id.*

<sup>10</sup> See Executive Order at §§ 1-101, 3-3, and 4-401.

<sup>11</sup> *Id.*

process.<sup>12</sup> Business and industry contend that the Executive Order and Title VI ultimately work to the economic disadvantage of low-income and communities of color because it makes industry reluctant to do business or relocate in these communities.<sup>13</sup> Time and again, impacted communities have disagreed, insisting not only that these communities are better positioned to determine their own best interests, but that they opt for the enforcement of environmental and civil rights laws to improve the environmental conditions in their communities, which in turn is likely to promote environmentally-friendly economic development. It now appears the Draft Framework/Outline adopts a position that runs counter to the stated interests of impacted communities by failing to implement the intent of the Executive Order and its much needed tools to achieve environmental justice.

As long as EPA fails to specifically and clearly address environmental inequities as the race and class phenomenon that they are – and measure its own progress in that regard – the agency will never know if it is alleviating, or continuing to perpetuate, racial and income disparity. In short, denial is not an appropriate regulatory option.

**A. Executive Order’s Intent and Requirement to Focus Environmental Justice on Disproportionately Impacted Communities of Low-Income and Color**

As previously stated, the Executive Order was issued to ensure that low-income communities of color were no longer subjected to disproportionately high levels of environmental risk and illness. It stated:<sup>14</sup>

*...each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations in the United States.*

Furthermore, in a Presidential Memorandum accompanying the Order, the President emphasized that the Order was all part of the Administration’s efforts to “prevent those minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”<sup>15</sup>

This Draft Framework/Outline fails to make any key determinations on what makes up an environmental justice area, or what specific attributes should be examined

---

<sup>12</sup> See written testimony of Sue Briggum, Director of Environmental Affairs, Waste Management, Inc., “Business Perspective on Environmental Justice,” delivered to the U.S. Commission on Civil Rights, Washington, DC, (Feb. 8, 2002), p. 2.

<sup>13</sup> *Id.*; also see Commission Report at 4. Report pointed out that the bulk of available data, however, is contrary to this claim.

<sup>14</sup> See Executive Order *supra* note 10.

<sup>15</sup> See Presidential Memorandum Accompanying Executive Order 12898 (February 11, 1994).

by agency staff to map areas where environmental injustices need to be addressed. The Executive Order not only requires agencies to collect data on the health and environmental impacts of their programs and activities on minority and low-income populations, but also requires agencies to target programs, policies, or activities for revision in order to promote health, improve research and data collection, ensure public participation, and track environment resource consumption patterns.<sup>16</sup> An important part of carrying out the Order's requirements is to clearly define and identify the intended recipients of these actions: "minority populations" and "low-income populations" that suffer from "disproportionately high and adverse human health effects" (disproportionate impacts).<sup>17</sup> The Draft Framework/Outline, however, is completely silent in making any of these important threshold determinations by failing to define the intended recipient.

The shortcomings of the Draft Framework/Outline and EPA's failure, generally, to define key terms have been the subject of significant criticism. In a report released in 2004, EPA's Office of the Inspector General (OIG) determined that EPA had failed to properly implement the intent of the Executive Order. The OIG Report stated:<sup>18</sup>

*EPA's ability to comply with the Order's requirement in a consistent manner is impeded if it does not first identify the intended recipients of the environmental justice actions. Not defining what a minority and low-income community is makes it difficult for EPA program staff to incorporate environmental justice into its day-to-day activities.*

The OIG report supported its critique by citing EPA's own 1995 Environmental Justice Strategy ("1995 Strategy") which stated the following in its "Objectives for Enforcement, Compliance, and Regulation:"<sup>19</sup>

*EPA will include in its enforcement efforts identification of communities and populations, such as low-income urban and rural populations which suffer from disproportionately high and adverse human health or environmental effects.*

The 1995 Strategy was a result of the Order's requirement for each federal agency to finalize its environmental justice strategy. It is unclear whether the proposed Strategic Plan intends to supplant previous stated policy in regards to environmental justice (i.e. 1995 Strategy), but it is clear that the Strategic Plan's omission of key definitions and lack of focus on identifying and addressing minority and low-income populations

---

<sup>16</sup> See Executive Order at §§ 1-101, 3-3, and 4-401.

<sup>17</sup> *Id.* at § 1-103

<sup>18</sup> See EPA Office of Inspector General, Evaluation Report: *EPA Needs to Consistently Implement the Intent of the Executive Order on Environmental Justice*, Report No. 2004-P-00007 (March 1, 2004) ("OIG Report") at 8.

<sup>19</sup> See *Id.* at 9 citing EPA's Environmental Justice Strategy (April 3, 1995).

certainly de-prioritizes their importance and, as the OIG Report points out, the intent of the Executive Order.<sup>20</sup>

The OIG was not alone in its criticism of EPA's failure to implement the Executive Order. In a 2003 report, the U.S. Commission on Civil Rights ("Commission") concluded that EPA had done a poor job in incorporating environmental justice into its core mission.<sup>21</sup> The Commission commented that EPA had no accountability or critical assessment component, such as definitions for who the intended recipients are, for its environmental justice programs, resulting in its ultimate failure to implement the Executive Order.<sup>22</sup>

Other Federal agencies and offices have already established and defined key working definitions to guide the agency in the implementation of the Executive Order's requirements. The White House's Council on Environmental Quality ("CEQ"), which has oversight of the Federal government's compliance with the Executive Order, provided some useful guidance in 1997. The CEQ developed specific definitions for "Low-Income," "Minority," and "Disproportionately high and adverse human health effects" to be of use in interpreting the Order.<sup>23</sup> In addition, the Department of Transportation has subsequently adopted working definitions and implemented procedures to specifically address the Executive Order's mandate of focusing environmental justice efforts on disproportionately impacted low-income communities of color.<sup>24</sup> While such definitions may have their weaknesses, and might need refinement, clearly these governmental institutions do not pretend that racial and class disparities simply do not exist. EPA needs to make a similar good-faith effort.

### **III. Other Recommended Changes to Draft Framework/Outline**

#### **A. Environmental Justice Vision Statement**

We recommend that this statement be deleted in its entirety. The definition on its own is ample to serve as the vision statement. It is our belief that the proposed vision statement only furthers the idea of "environmental justice is for everyone," which we believe strays from the intent of the Executive Order and will fail to address environmental injustices in disproportionately impacted communities. (*See* comments in Section II of this letter)

---

<sup>20</sup> *See Id.* at 7 and ii stating, "the intent of the [Order] is to specifically outline the Federal actions needed to address environmental justice for minority and low-income populations...however, the Agency does not take into the account the inclusion of minority and low-income populations, and indicated it is attempting to provide environmental justice for everyone."

<sup>21</sup> *See* U.S. Commission on Civil rights, *Not in My Backyard: Executive Order 12,898 and Title VI as Tools for Achieving Environmental Justice* (October 2003)(the "Commission Report").

<sup>22</sup> *Id.* at 8-9.

<sup>23</sup> Executive Office of the President, Council on Environmental Quality "Environmental Justice Guidance Under the National Environmental Policy Act," Appendix A, "Guidance for Federal Agencies on Key Terms in Executive Order 12898," p. 25 (December 10, 1997)(the "CEQ EJ Guidance").

<sup>24</sup> *See* U.S. Department of Transportation (DOT) Order 5610.2: *Environmental Justice in Minority Populations and Low-Income Populations* (April 15, 1997)(the "DOT EJ Order"); *also see* CEQ EJ Guidance *supra* note 23.

## B. Definitions

Definitions are needed for “disproportionately high and adverse human health effects,” and “low-income” and “minority” populations to provide guidance to staff so they can incorporate environmental justice into day-to-day operations, to identify the intended recipients of the Executive Order’s program requirements, and to evaluate performance in addressing whether agency efforts are successful.

As a reference, for example, CEQ issued guidance on how to define key terms regarding the Executive Order:<sup>25</sup>

1. “Low-income populations” are based on the annual statistical poverty thresholds from the Census Bureau’s Current Population Reports;
2. “Minority” is defined as anyone who is American Indian or Alaska Native, Asian or Pacific Islander, black (non-Hispanic origin) or Hispanic; and
3. “Minority populations” are defined as where “the minority population of an affected area exceeds 50 percent or the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population.”

For additional reference, U.S. Department of Transportation (“DOT”) has also issued specific definitions to implement the Executive Order:<sup>26</sup>

1. “Minority” is defined as:
  - a. Black (a person with origins in any of the black racial groups of Africa);
  - b. Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture regardless of race);
  - c. Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); and
  - d. American Indian or Alaskan Native (a person having origins in any of the original people of North America and who maintains a cultural identification through tribal affiliation or community recognition).
2. “Low Income” is defined as:

---

<sup>25</sup> See CEQ EJ Guidance at p. 15.

<sup>26</sup> See DOT EJ Order *supra* note 24; also see CEQ EJ Guidance at 15.

A person whose median household income is at or below the Department of Health and Human Services guidelines.

3. “Disproportionately high and adverse effect on minority and low-income populations” is defined as:

Adverse effects that are predominantly borne by a minority and/or low-income population, or will be suffered by the minority and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority and/or non-low-income population.

### C. Environmental Justice Priorities

Absent specific goals and objectives tailored to how EPA intends to fulfill its environmental justice mission, it is premature to prioritize issues. The Draft Framework/Outline only includes agency-wide goals and objectives, which are not specifically tailored to fulfill the agency’s environmental justice responsibilities. This point underscores EPA’s attempt to make environmental justice another reiteration of the agency’s overall mission to protect the environment for everyone, rather than to redress structural failures that lead to differences in availability of health data, public participation opportunities, insufficiently protective standards, programs that allow concentration of pollutants in already highly impacted communities, and poor enforcement in low-income and communities of color. As stated in this letter, this is antithetical to the intent of the Executive Order.

At a national level, prioritizing these issues does not serve the needs of achieving environmental justice in communities. Every community has a different suite of issues it is facing. As a result, prioritizing forces the agency to engage in a rough “comparative risk” assessment – making subjective judgments on whether one issue is more important than another (i.e., is cancer more important to address or asthma? or lead? air pollutants or hazardous waste sites?). This form of issue ranking produces a "worst-first" list without any consideration of the resources and opportunities available to address conditions, and without an assessment of vulnerabilities of particularly situated communities. Such a rough ranking also implies that one should first and most vigorously address top-ranked issues.

Using this approach is unwise on an agency-wide level and fails to address environmental justice issues because it would likely limit, postpone, or prevent the elimination of significant but lower-ranked issues. Historically, disproportionately impacted communities know all too well about being low on the priority list for the protection of their environment and health. The Executive Order was intended to correct this problem. Adopting an agency-wide issue priority approach, however, would only serve to further institutionalize this inequitable paradigm. Simply, as stated in the Executive Order, environmental justice should be the priority. Moreover, even if such a

ranking exercise is appropriate within a narrower context, this endeavor would require a more inclusive participatory approach, giving impacted communities ample time, resources, and information to agree upon a specific set of criteria and assess a relative ranking based upon such criteria. Clearly, the agency has not taken these steps, essentially requesting a blind, gestalt ranking of issues.

### **III. CONCLUSION**

We fully support EPA's efforts to adopt a formal Strategic Plan to help the Agency track progress and benchmark its environmental justice objectives. Nevertheless, we strongly encourage EPA to set a correct course from the onset that is consistent with the requirements of the Executive Order. Unfortunately, the Draft Framework/Outline, in its current form, fails to protect society's least advantaged against the health and economic effects of unjust environmental burdens.

We look forward to future opportunities to work with EPA on the development of this Strategic Plan.

Sincerely,

Shaking Alston  
Executive Director  
NYC Environmental Justice Alliance

Frances Beinecke  
Executive Director  
Natural Resources Defense Council

Bradley Angel  
Executive Director  
Greenaction for Health & Environmental Justice

S. Elizabeth Birnbaum  
V.P. for Government Affairs  
American Rivers

Luis Arteaga  
Executive Director  
Latino Issues Forum

Lena Brook  
Associate Director, California  
Clean Water Action

Lynn Barris  
Butte Environmental Council

Margaret Cohen  
Director  
West Oakland Environmental  
Indicators Project

Luke Cole, Esq.  
Director  
Center on Race, Poverty and Environment

Anne Kelsey Lamb, MPH  
Director  
Regional Asthma Management and  
Prevention (RAMP) Initiative

Antonio Díaz  
Executive Director  
PODER

Denny Larson  
Coordinator  
National Refinery Reform Campaign

Kathleen Durns, Ph.D.  
Director  
Sciencecorps.org

Joseph K. Lyou, Ph.D.  
Executive Director  
California Environmental  
Rights Alliance

Eileen Gauna, Esq.  
Professor  
Southwestern University School of Law

Norris McDonald  
President  
African American Environmentalist  
Association

Jeff Gleason  
Deputy Director  
Southern Environmental Law Center

Susan West Marmagas, MPH  
Director of Environment and  
Health Program  
Physicians for Social Responsibility

Wenonah Hauter  
Director, Energy Program  
Public Citizen

Jesse N. Marquez  
Executive Director  
Coalition for a Safe Environment

Shabaka Heru  
Executive Director  
Community Coalition for Change

Vernice Miller-Travis  
Miller-Travis & Associates

Marianne Engelman Lado  
General Counsel  
New York Lawyers for Public Interest

Teresa B. Mills  
Director  
Buckeye Environmental Network

Gwen Lachelt  
Director  
Oil and Gas Accountability Project

Richard Moore  
Executive Director  
Southwest Network for  
Environmental and Economic Justice

A.J. Napolis  
Program Director  
Communities for a Better Environment

Peggy Sheppard  
Executive Director  
West Harlem Environmental  
Action, Inc.

Alan Ramos  
Professor & Director  
Environmental Law and Justice Clinic  
Golden Gate University School of Law

Theodore M. Shaw  
Director-Counsel and President  
NAACP Legal Defense &  
Educational Fund, Inc

Roger Rivera  
President  
National Hispanic Environmental Council

Vivian Stockman  
Project Coordinator  
Ohio Valley Environmental  
Coalition

Judith Robinson  
Special Projects Director  
Environmental Health Fund

Robina Suwol  
Executive Director  
California Safe Schools

Tiffany Schauer  
Executive Director  
Our Children's Earth

Terri Swearingen  
Director  
Tri-State Environmental Council

Martin Schlageter  
Campaign and Advocacy Director  
Coalition for Clean Air

Diane Takvorian  
Executive Director  
Environmental Health Coalition

Conrad G. Schneider  
Advocacy Director  
Clean Air Task Force

Elizabeth Thompson  
Legislative Director  
Environmental Defense

Brian P. Urbaszewski  
Director of Environmental Health Programs  
American Lung Association of Metropolitan Chicago

Michael Warburton  
Executive Director  
Public Trust Alliance

Elizabeth C. Yeampierre, Esq.  
Executive Director  
UPROSE

David Zwick  
President  
Clean Water Action/Clean Water Fund

.

.