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Riverkeeper * Sierra Club * Southern Alliance for Clean Energy * Southern Environmental Law Center * Spokane Riverkeeper * Stewards of the Lower Susquehanna, Inc. * St. Johns Riverkeeper, Inc. * St. Louis Ethical Society * Suncoast Waterkeeper * Tennessee Clean Water Network * Tennessee Riverkeeper * Three Rivers Waterkeeper * Toe River Valley Watch * Uniting People with Opportunities * Upper Missouri Waterkeeper * Valley Watch * Wabash Riverkeeper * Watauga Riverkeeper * Waterkeeper Alliance * Western North Carolina Alliance * Western Organization of Resource Councils * World Temperate Rainforest Network * Yadkin Riverkeeper Inc

September 20, 2013

Water Docket
U.S. Environmental Protection Agency,
Mail Code 4203M
1200 Pennsylvania Ave, NW
Washington, DC 20460

Attention Docket ID No. EPA-HQ-OW-2009-0819

Comments on Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category

The undersigned organizations appreciate the opportunity to comment on EPA's proposed *Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category*. **Our organizations urge EPA to select Option 5 for the final rule. Option 5 would eliminate almost all toxic discharges from power plants, reducing pollution by more than 5 billion pounds a year.** Strong rules are urgently needed because Steam Electric Power Plants are responsible for at least 50 to 60 percent of the toxic pollutants discharged into waters of the U.S. - more than the other nine top polluting industries *combined*.¹ Despite the scope of this pollution problem, the existing standards have not been updated since 1982 and fail to set discharge limits on a long list of dangerous pollutants toxic to humans and aquatic life, including arsenic, mercury, lead and selenium. According to EPA, this failure has led to over 160 water bodies not meeting state water quality standards, 185 waters with fish consumption advisories and the degradation of 399 water bodies across the country that are drinking water supplies.²

The Clean Water Act requires states to set strong discharge standards for polluters in the absence of federal standards.³ Unfortunately, most state permitting agencies have failed to set limits in discharge

¹ EPA, *Environmental Assessment for the Proposed Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category* 3-14 (April 2013)

² <http://water.epa.gov/scitech/wastetech/guide/steam-electric/proposed.cfm>

³ 33 U.S.C. § 1314 (b); 40 C.F.R. § 122.44(a)(1), 123.25, 125.3

permits for individual plants that reflect the best available treatment technology and protect water quality. In fact, a coalition of environmental groups recently released a report that found that nearly 70% of the power plants that discharge coal ash wastewater or sludge from flue gas desulphurization (“FGD”) systems, also known as scrubbers, have NO limits for arsenic, boron, cadmium, lead, mercury, and selenium, all of which are toxics commonly found in these wastewater streams.⁴

EPA has an obligation under the Clean Water Act to end this reckless practice. Our organizations urge the Agency to move forward with Option 5, which would require power plants to control all of their pollution, not just some of it. EPA has proposed eight regulatory options, four of which are “preferred.” Yet none of the Agency’s “preferred” regulatory options are adequate to address this widespread pollution problem. The most stringent “preferred” option proposed by EPA (option 4a) would eliminate only 2.62 billion pounds of pollution – roughly less than half of all the annual pollution loading from power plants⁵. In contrast, Option 5, though not preferred by the Agency, would eliminate 96% of all pollution from power plants, cutting an estimated 5.3 billion pounds a year.⁶ For decades, the power plant industry has been given a free pass to dump their toxic wastewater into our rivers, lakes, streams and bays, but EPA’s analysis of Option 5 demonstrates that we can virtually eliminate this predominant source of toxic pollution to our waters using technologies that are readily available and affordable to the industry.

Our organizations support EPA’s proposal to require “zero discharge” of fly ash wastewater for all existing power plants. Wastewater treatment technologies that can drastically reduce or even eliminate discharges of toxic fly ash pollution are already in use at some power plants. Since 1982, new power plants have been required to dry handle their fly ash, so industry has more than 30 years of experience installing systems that eliminate fly ash transport water. In fact, 80% of existing power plants have already completely eliminated discharges of fly ash wastewater.⁷ The remaining 20% of plants that rely primarily on “settling ponds” to treat fly ash are decades behind upgrading to the best available technology. Settling ponds are ineffective at treating dissolved metals and nutrients and when plants discharge wastewater from ash settling ponds into surface water they can impair water quality and cause ecological damage to aquatic systems. EPA has already documented dozens of cases where power plant water pollution has harmed aquatic ecosystems.⁸

Our organizations urge EPA to require “zero discharge” of bottom ash wastewater for all new and existing power plants, as proposed under Options 4 or 5. Approximately 42% of existing coal and coke units have also eliminated discharges of bottom ash wastewater by using dry handling or closed-loop systems.⁹ Even though a large portion of the power plant sector has already moved away from

⁴ Environmental Integrity Project, Sierra Club, Clean Water Action, Earthjustice and Waterkeeper Alliance, *Closing the Floodgates: How the Coal Industry is Poisoning Our Water and How We Can Stop It* (2013), available at <http://cleanwater.org/files/publications/closing-floodgates.pdf>

⁵ 78 Fed. Reg. at 34,485- 34,486 (Table IX-4)

⁶ *Id.*

⁷ *Id.* at 34,439

⁸ EPA, *Environmental Assessment for the Proposed Effluent Limitation Guidelines and Standards for the Steam Electric Power Generating Point Source Category* See Appendix A, Tables A-1, A-8, and A-10

⁹ 78 Fed. Reg. at 34,470

discharging bottom ash wastewater, none of EPA's "preferred" options would require all of the remaining 60% of plants to follow suit. Three "preferred" options would require NONE of those power plants to use dry handling or closed-loop systems to eliminate their bottom ash wastewater discharges, and Option 4a would only require coal-burning boilers with a generating capacity above 400 MW to do so.¹⁰ The remaining plants under each of these options would still be allowed to use settling ponds as the only treatment method, even though the Agency has repeatedly acknowledged that ponds are not effective at treating pollutants of concern.¹¹ The industry itself already recognizes that dry handling of bottom ash is technologically available and affordable, yet EPA's "preferred" options for bottom ash handling ignores this trend.

Our organizations urge EPA to require chemical precipitation plus vapor evaporation to treat FGD wastewater, as proposed under Option 5. FGD, or "scrubber" wastewater is especially toxic, and this wastestream will only increase in volume and toxicity as more power plants install scrubbers to control air pollutants. Unfortunately, much of that toxic waste is ending up in our water. Of the 145 power plants identified by EPA to generate scrubber wastewater, over half use only surface impoundments (settling ponds) to treat that wastewater.¹² As mentioned previously, ponds are ineffective at treating dissolved metals, nutrients and total dissolved solids. Most of the options proposed by EPA would require existing and new power plants to control scrubber wastewater with a combination of chemical and biological treatment. However, neither of those technological options effectively treat for bromide and other total dissolved solids. Bromide is of particular concern for plants that discharge near drinking water intakes because it can create harmful byproducts when mixed with disinfectants used to treat drinking water. Vapor evaporation technology exists that can reduce scrubber discharges to near zero, the only way to eliminate this source of bromides from our drinking water supplies.

When considering costs, the Clean Water Act allows EPA to evaluate whether costs can be reasonably borne by the industry as a whole.¹³ EPA acknowledges in its proposal that Option 5 would by far remove the largest amount of pollutants from power plant discharges, resulting in the greatest benefit to public health and the environment.¹⁴ And EPA has estimated that most utilities would only incur costs of less than 1% of annual revenue.¹⁵ Yet the Agency claims it did not select Option 5 as a "preferred" option because of concern that it is too expensive when compared with the other options. Clearly this industry can bear the comparatively small cost to comply with requirements mandated by the Clean Water Act to clean up their toxic discharges. Society has been unfairly forced to bear the cost of these discharges for decades.

Our organizations urge EPA to monetize the benefit of reduced costs for drinking water treatment, reduced non-cancer health impacts and other benefits mentioned in its analysis but not monetized in

¹⁰ *Id.* at 34,458 (Table VIII-1)

¹¹ *Id.* at 34,476

¹² 78 Fed. Reg. at 34,451

¹³ See *Waterkeeper Alliance v. U.S. EPA*, 399 F.3d 486, 516 (2d Cir. 2005) and *Rybachek v. U.S. EPA*, 904 F. 2d 1276, 1290-91 (9th Cir. 1990)

¹⁴ *Id.* at 34,473

¹⁵ *Id.* at 34,494 (Table XI-4); 34,493

order to provide a more accurate assessment of the benefits of the proposed rule. Though not required by the Clean Water Act and not allowed to be used to determine best available technology to achieve effluent reductions,¹⁶ EPA conducted a cost-benefit analysis to accompany this proposal.¹⁷ Our organizations are concerned that the Agency chose not to monetize certain benefits, particularly the reduced cost of drinking water treatment for pollutants with drinking water criteria. By EPA's own estimate, nearly 400 water bodies that are sources of drinking water have been degraded by power plant water pollution. The agency also did not monetize non-cancer health benefits (other than IQ benefits from reduced childhood exposure to lead and in-utero exposure to mercury), or benefits to tourism.

For decades, power plants have used our water resources as dumping grounds for their toxic wastewater while EPA and the states have turned a blind eye. Fortunately, treatment technologies are available today that can achieve near zero discharge of pollution at a cost that is affordable to the industry as a whole. EPA must also make these more protective standards effective as soon as possible, rather than giving the industry eight years to comply, as has been proposed. **Our organizations urge EPA to move swiftly to finalize Option 5, which would eliminate billions of tons of pollution a year, resulting in thousands of river miles that are safer to swim and fish in, and thousands of miles of cleaner drinking water sources.**

Sincerely,

Pamela Miller
Executive Director
Alaska Community Action on Toxics
Anchorage, Alaska

Lyman Welch
Water Quality Program Director
Alliance for the Great Lakes
Chicago, Illinois

¹⁶ [http://www.cleanwateraction.org/files/publications/OMB%20Letter 4 15 filed2-1.pdf](http://www.cleanwateraction.org/files/publications/OMB%20Letter%204%2015%20filed2-1.pdf)

¹⁷ *Id.* at 34,503

Robby Arrington
Altamaha Riverkeeper
Deborah Sheppard
Executive Director
Altamaha Riverkeeper
Darien, Georgia

Greg Rolf
Stewardship Coordinator
American Canoe Association
Fredericksburg, Virginia

Katherine Baer
Senior Director, Clean Water Supply Program
American Rivers
Washington, DC

Anthony Thomas
Education Program Coordinator
Anacostia Community Museum
Washington, DC

James R. Foster
President
Anacostia Watershed Society
Bladensburg, Maryland

Kathy Phillips
Assateague Coastkeeper
Assateague Coastal Trust
Berlin, Maryland

Tony Janisch
Executive Director
Bad River Watershed Association
Ashland, Wisconsin

Ann Mesrobian
Conservation Chair
Bastrop County Environmental Network
Bastrop, Texas

Alexis Segal
Executive Director & Waterkeeper
Biscayne Baykeeper
Miami, Florida

Charles Scribner
Executive Director
Black Warrior Riverkeeper
Birmingham, Alabama

Myra Crawford, PhD, MPH
Executive Director & Riverkeeper
Cahaba Riverkeeper
Birmingham Alabama

Kemp Burdette
Cape Fear Riverkeeper
Cape Fear River Watch
Wilmington, North Carolina

Sam Perkins
Catawba Riverkeeper
Catawba Riverkeeper Foundation
Charlotte, North Carolina

Miyoko Sakashita
Oceans Director & Senior Attorney
Center for Biological Diversity
San Francisco, California

Christine Cordero
National Training Program Director
Center for Story-based Strategy
Oakland, California

Juliet Cohen
General Counsel
Chattahoochee Riverkeeper
Atlanta, Georgia

Nicole Hayler
Executive Director
Chattooga Conservancy
Clayton, Georgia

Diana Dascalu-Joffe
Senior General Counsel
Chesapeake Climate Action Network
Takoma Park, Maryland

Cathy Edmiston
President
Citizens Against Longwall Mining
Witt, Illinois

Ellen Rendulich
Director
Citizens Against Ruining the Environment
Lockport, Illinois

Sarah Eckel
Legislative & Policy Director
Citizens Campaign for the Environment
Syracuse, New York

Aimee Erickson
Executive Director
Citizens Coal Council
Bridgeville, Pennsylvania

Jennifer Peters
National Water Campaigns Coordinator
Clean Water Action
Washington, DC

Katie Hicks
Assistant Director
Clean Water for North Carolina
Asheville, North Carolina

Ruth Santiago
Attorney
Comite Dialogo Ambiental, Inc
Salinas, Puerto Rico

Juanita Sneeuwjagt
President
Committee for Constitutional & Environmental Justice
Clintwood, Virginia

Diane Hofner
Co-Founder Crop Plus
Concerned Residents of Portland, NY + People Like Us
Mayville, New York

Bill Stangler
Riverkeeper & Executive Director
Congaree Riverkeeper
Columbia, South Carolina

Bob Shavelson
Inletkeeper & Executive Director
Cook Inletkeeper
Homer, Alaska

Frank Chitwood
Riverkeeper
Coosa Riverkeeper
Chelsea, Alabama

Kristin S. Carpenter
Executive Director
Copper River Watershed Project
Cordova, Alaska

Terry Thirion
Director & Coordinator
Disappearing Frogs Project
Charlotte, North Carolina

Abigail Dillen
Vice-President of Litigation: Climate & Energy
Earthjustice
New York, New York

Ally Fields
Clean Water Advocate
Environment America
Washington, DC

Mike Belliveau
Executive Director
Environmental Health Strategy Center
Portland, Maine

Gordon R. Hensley
San Luis Obispo Coastkeeper
Environment in the Public Interest
San Luis Obispo, California

Jennifer Duggan
Managing Attorney
Environmental Integrity Project
Washington, DC

Colin Bailey
Executive Director
Environmental Justice Coalition for Water
Sacramento, California

Mahseeyahu Ben Selassie, MSW, MPH, ACSW,
LGSW
President
Environmental Justice Partnership of Baltimore
Baltimore, Maryland

Jessica Dexter
Staff Attorney
Environmental Law & Policy Center
Chicago, Illinois

Karen Bonnell
Farm Owner & Member,
Fall-line Alliance for a Clean Environment
Washington County, Georgia

Gordon Rogers
Riverkeeper and Executive Director
Flint Riverkeeper
Albany, Georgia

Rebecca Fedewa
Executive Director
Flint River Watershed Coalition
Flint, Michigan

Hartwell Carson
French Broad Riverkeeper
Asheville, North Carolina

Robert Burns
Detroit Riverkeeper
Friends of the Detroit River
Trenton, Michigan

Ben Schreiber
Acting Climate and Energy Program Director
Friends of the Earth
Washington, DC

Laura Calwell
Kansas Riverkeeper
Friends of the Kaw
Lawrence, Kansas

Charlotte Cherry
Galveston Baykeeper
Galveston Baykeeper
Seabrook, Texas

Robert Gardner
Climate and Energy Campaigner
Greenpeace USA
Washington, DC

Cynthia Sarthou
Executive Director
Gulf Restoration Network
New Orleans, Louisiana

Theaux M. Le Gardeur
Riverkeeper
Gunpowder Riverkeeper
Monkton, Maryland

Christopher Thomas
Executive Director
HEAL Utah (the Healthy Environment Alliance of Utah)
Salt Lake City, Utah

Steven G. Gilbert, PhD, DABT
Director & Founder
INND (Institute of Neurotoxicology & Neurological Disorders)
Seattle, Washington

Ralph Rosenberg
Executive Director
Iowa Environmental Council
Des Moines, Iowa

Scott Kovarovics
Executive Director
Izaak Walton League of America
Gaithersburg, Maryland

Mary Bettis Love
Member, Litigation Team
Kentuckians for the Commonwealth
London, Kentucky

Deborah Payne, MPH
Energy and Health Coordinator
Kentucky Environmental Foundation
Berea, Kentucky

Judith Petersen
Executive Director
Kentucky Waterways Alliance
Louisville, Kentucky

Patricia Schuba
President
Labadie Environmental Organization (LEO)
Labadie, Missouri

Sandy Bihn
Executive Director
Lake Erie Waterkeeper Inc.
Oregon, Ohio

Shannon Williamson
Executive Director
Lake Pend Oreille Waterkeeper
Sandpoint, Idaho

Earl L. Hatley
Grand Riverkeeper, Oklahoma
LEAD Agency, Inc.
Vinita, Oklahoma

Tiernan Sittenfeld
Senior Vice President, Government Affairs
League of Conservation Voters
Washington, DC

Curt Havens
President
Sabrina Mislevy
Vice President
Little Blue Regional Action Group
Pennsylvania & West Virginia

Tracy Kuhns
Louisiana Bayoukeeper
Louisiana Bayoukeeper, Inc
Barataria, Louisiana

Marylee Orr
Executive Director
Louisiana Environmental Action Network
Baton Rouge, Louisiana

Paul Orr
Riverkeeper
Lower Mississippi Riverkeeper
Baton Rouge, Louisiana

Brianne D. Callahan
Executive Director / Baykeeper
Massachusetts Baykeeper, Inc.
Watertown, Massachusetts

Timothy D. Junkin
Director
Midshore Riverkeeper Conservancy
Easton, Maryland

Cheryl Nenn
Riverkeeper
Milwaukee Riverkeeper
Milwaukee, Wisconsin

Heather B. Navarro
Executive Director
Missouri Coalition for the Environment
St. Louis, Missouri

Jeff Ordower
Executive Director
Missourians Organizing for Reform and Empowerment
St. Louis, Missouri

Casi (kc) Callaway
Executive Director & Baykeeper
Mobile Baykeeper
Mobile, Alabama

Anne Hedges
Program Director
Montana Environmental Information Center
Helena, Montana

Krissy Kasserman
Youghiogheny Riverkeeper
Mountain Watershed Association
Melcroft, Pennsylvania

James A. McGrath
Activist
National Committee for the New River
Eggleston, Virginia

Dr. Elena Rios
President & CEO
National Hispanic Medical Association
Washington, DC

Mark Magaña
Executive Director
National Latino Coalition on Climate Change
Washington, DC

Jim Murphy
Senior Counsel
National Wildlife Federation
Montpelier, Vermont

Matthew Starr
Upper Neuse Riverkeeper
Neuse RIVERKEEPER® Foundation
Raleigh, North Carolina

Mariel Nanasi
Executive Director
New Energy Economy
Santa Fe, New Mexico

Douglas Meiklejohn
Executive Director
New Mexico Environmental Law Center
Santa Fe, New Mexico

Debbie Mans, Executive
Director & Baykeeper
New York/New Jersey Baykeeper
Keyport, New Jersey

Naeema Muhammad
Community Organizer
North Carolina Environmental Justice Network
Tillery, North Carolina

Peter Bahls
Executive Director
Northwest Watershed Institute
Port Townsend, Washington

Shelley Buonaiuto
Co-chair OMNI 350
OMNI Center for Peace, Justice & Ecology
Fayette, Arkansas

Heather Jacobs Deck
Pamlico-Tar RIVERKEEPER
Pamlico-Tar River Foundation
Washington, North Carolina

Frederick Tutman
Riverkeeper & CEO
Patuxent Riverkeeper
Upper Marlboro, Maryland

Kevin McAllister
Baykeeper & President
Peconic Baykeeper
Quogue, New York

Catherine Thomasson, MD
Executive Director
Physicians for Social Responsibility
Washington, DC

Paul Kysel
President
PINES Group
Town of Pines, IN

Robin Broder
Vice President
Potomac Riverkeeper, Inc.
Washington, DC

Traci Barkley
Water Resources Scientist
Prairie Rivers Network
Champaign, Illinois

Tyson Slocum
Director, Energy Program
Public Citizen
Washington, DC

Chris Wilke
Puget Soundkeeper and Executive Director
Puget Soundkeeper Alliance
Seattle, Washington

Art Norris
Board Member
Quad Cities Waterkeeper
Davenport, Iowa

Paul Gallay
President and Hudson Riverkeeper
Riverkeeper, Inc.
Ossining, New York

Wendy Wilson
National Director of Rivers, Energy & Climate
Programs
River Network
Boise, Idaho

Don McEnhill
Executive Director
Russian Riverkeeper
Healdsburg, California

Diane Wilson
Waterkeeper
San Antonio Bay Waterkeeper
Seadrift, Texas

Jill Witkowski
Waterkeeper
San Diego Coastkeeper
San Diego, California

Jason Flanders
Program Director
San Francisco Baykeeper
San Francisco, California

Dan Randolph
Executive Director
San Juan Citizens Alliance
Durango, Colorado

Don Mottley
Spokesperson
Save Our Rivers
Boonville, Indiana

Fred Kelly
Severn Riverkeeper
Severn Riverkeeper
Annapolis, Maryland

Jeff Kelble
Shenandoah Riverkeeper
Boyce, Virginia

Mary Anne Hitt
Director, Beyond Coal Campaign
Sierra Club
Washington, DC

Ulla Reeves
High Risk Energy Program Director
Southern Alliance for Clean Energy
Asheville, North Carolina

Frank Holleman
Senior Attorney
Southern Environmental Law Center
Chapel Hill, North Carolina

Bart Mihailovich
Director
Spokane Riverkeeper
Spokane, Washington

Michael Helfrich
Lower Susquehanna Riverkeeper
Stewards of the Lower Susquehanna, Inc
Wrightsville, Pennsylvania

Lisa Rinaman
St. Johns Riverkeeper
St. Johns Riverkeeper, Inc
Jacksonville, Florida

Alan Ranford
Member
St. Louis Ethical Society
St. Louis, Missouri

Justin Bloom
Executive Director
Suncoast Waterkeeper
Sarasota, Florida

Renee Hoyos
Executive Director
Tennessee Clean Water Network
Knoxville, Tennessee

David Whiteside
Executive Director and Riverkeeper
Tennessee Riverkeeper
Decatur, Alabama

John Stephen
Executive Director
Three Rivers Waterkeeper
Homestead, Pennsylvania

James Carroll
Board Member
Toe River Valley Watch
Penland, North Carolina

Guy Alsentzer
Upper Missouri WATERKEEPER® & Executive
Director
Upper Missouri Waterkeeper, Inc
Bozeman, Montana

Kenneth Carroll
Program Coordinator, P.O.W.E.R
Uniting People with Opportunities
Washington, DC

John Blair
President
Valley Watch, Inc.
Evansville, Indiana

Rae Schnapp, Ph.D.
Wabash Riverkeeper
Wabash Riverkeeper
Fayette, Indiana

Donna Lisenby
Watauga Riverkeeper
Boone, North Carolina

Marc Yaggi
Executive Director
Waterkeeper Alliance
New York, New York

Julie Mayfield
Co-Director
Western North Carolina Alliance
Asheville, North Carolina

Norm Cimon
Chairman
Western Organization of Resource Councils
Billings, Montana

Pat Rasmussen
Coordinator
World Temperate Rainforest Network
Olympia, Washington

Dean Naujoks
Executive Director
Yadkin Riverkeeper Inc
Winston Salem, North Carolina