National Association of Environmental Professionals
Be Connected

NAEP's Bi-Weekly
NATIONAL DESK

October 25, 2019

Lead NEPA Story: Judge weighs next steps in fight over Virginia power project

(Greenwire, 10/16/2019) **Pamela King, E&E News Reporter**

A federal judge yesterday probed claims by environmental and historic preservation groups that his court should toss Army Corp of Engineers permits for — and potentially dismantle — a Virginia electric transmission line.

The U.S. Court of Appeals for the District of Columbia Circuit's finding this year that the federal government did not conduct an adequate environmental analysis for an already completed 17-mile power line across the James River left challengers of the project in an unusual position.

They pressed U.S. District Court for the District of Columbia Judge Royce Lamberth, who is overseeing the case on remand, to scrap federal permits for the transmission line, an action that could require Dominion Virginia Power to disassemble the towers.

"What is the normal process?" Lamberth, a Reagan appointee, asked during a hearing yesterday.

Continued on page 9

Safe Drinking Water Act: Enviros lament 'lost opportunity' with lead rule revamp

(Greenwire, 10/11/2019) **Ariel Wittenberg, E&E News Reporter**

While EPA officials celebrate their new lead-in-drinking-water regulation, advocates lament the first update to the federal standards in nearly 30 years as a "lost opportunity."

The new standards, EPA says, will require water systems to act sooner to reduce lead levels in drinking water, and be more transparent about when lead levels are a risk to children and families. The new rule will also better protect children in the most vulnerable areas, the agency says.

But public health experts say the new standard is more rollback than revamp, slowing the pace at which lead pipes will be replaced nationwide. While there are some much-needed improvements in the new proposal, they say, it won't be enough to counteract other steps back.

"This is a huge lost opportunity, a huge disappointment, because there is a huge hole in the rule," said Erik Olson, senior strategic director for health and food at the Natural Resources Defense Counsel.

Inside This Issue…

Clean Water Act: Greens join legal fray over EPA's dropped Pebble veto threat 5

NEPA: A 'modest' impact from a major Tongass National Forest rule? 5

NEPA: Judge blocks 'weakened' sage grouse plans 7

The most concerning provision in the rule, advocates say, is one that changes what utilities have to do if high lead levels are found in drinking water.

Lead pipes are the primary source of the neurotoxin in drinking water, and many advocates have called for EPA to require their wholesale removal, regardless of whether high lead levels are found at the tap.

Currently, utilities are required to remove 7% of lead pipes per year if lead concentrations are found to exceed 15 parts per billion at more than 10% of taps sampled.

The new rule would drop that lead pipe replacement rate to just 3% annually.

That means while under the current rule, utilities would have 13 years to remove their lead pipes, the new rule would give them 33 years to do so.

But EPA says the new proposal would still result in lead pipes being removed sooner because it would also close loopholes utilities can currently use to say they have removed more lead pipes than have actually been taken out of the ground. For example, utilities are currently able to retest at taps and count those where lead levels have decreased toward their 7% removal rate.

That wouldn't be allowed under the new rule, which also wouldn't allow partial lead service line replacements — where only the utility-owned section of pipe is removed but lead plumbing remains in people's homes — to count toward the 3% goal.

"The old number was 7%, but there were offramps where you didn't actually have to do 7%," EPA Administrator Andrew Wheeler said yesterday. "So our 3% is actually far more aggressive than what the previous regulation had. We believe we are on track to get the lead service lines replaced at a much faster rate than before."

The proposal itself says the changed provision will result in between 205,452 and 261,701 full lead pipe replacements over a 35-year period compared with the current regulation. More details on that calculation will likely become available in the next few weeks, when the proposal is published in the Federal Register, along with a cost-benefit analysis.

But Carl Reeverts, who worked in the Office of Water from 1975 to 2014, called that calculation "pie in the sky."

"It probably won't show itself in reality," he said.

While EPA knows anecdotally that some utilities have taken advantage of loopholes to overestimate how many lead pipes they have removed, Reeverts said neither the agency nor the states actually track that data.

Closing the loopholes is a good idea, he said, but knowing its impact would be difficult to calculate.

"Reducing from 7% to 3% reduces the pace of lead service line replacement, period," he said. "If they are saying they can increase it, show me. I can't check their math."

Asked why the agency didn't just close the loopholes but maintain the 7% replacement rate, an EPA official briefing the press on background seemed to say the change was a concession to the drinking water utility agency.

"We think that 3% is a feasible level for a water system to replace if they have an action level exceedance," she said.

But Dimple Chaudhary, a senior attorney with NRDC who sued the city of Flint, Michigan, to force it to remove lead pipes, said the city's progress shows utilities can expedite lead pipe removals.

Under a 2017 settlement, the city has already removed more than 22,000 lead pipes and replaced more than 9,000 lead and galvanized steel lines. NRDC estimates just 1,000 more lead pipes need to be removed in the city.

"A water utility does not need more than three decades to replace its lead service lines," she said. "NRDC's work in Flint shows that."

'Window dressing'

While most aspects of the new rule don't roll back current standards, advocates take issue with the failure to improve upon them.

For example: the 15-parts-per-billion lead action level.

When it was established in 1991, the 15-ppb standard was part of a compromise with the water utility industry. At the time, the Centers for Disease Control and Prevention had a 10-micrograms-per-deciliter threshold for blood lead levels in children and infants.

EPA calculated that its 15-ppb action level for lead in water would result in less than 5% of children younger than 7 years old with blood lead levels exceeding that threshold. The CDC lowered that blood lead level threshold, bringing it down to 5 micrograms per deciliter, in 2012.

Because of the updated CDC standard, many public health advocates — and members of Congress like Rep. Dan Kildee (D-Mich.), who represents Flint — argued that EPA should lower its lead action level in the new rule.

That didn't happen.

Instead, the rule keeps the 15-ppb lead action level and creates a new standard, called a "trigger" level.

Under the proposal, once lead levels hit a 10-ppb trigger level of lead in water, utilities would have to consult with states about how to better use chemicals to prevent lead pipes from corroding, and also start thinking about removing lead pipes and how they would respond if or when their levels exceed the 15-ppb standard.

Public health advocates note that a lack of attention to corrosion control techniques can have real consequences — and was a major contributor to the drinking water crisis in Flint. But, they say, rather than establish a trigger level, EPA should have lowered the action level.

Betsy Southerland, a former career official in EPA's Office of Water, called the trigger level "window dressing."

"It makes it seem like they are lowering something, but there is nothing actually required if you hit the 10 ppb," she said. "It is not a step forward."

Kildee, too, slammed EPA for not updating the action level, "which is already too high."

"The Flint water crisis should have taught policymakers at all levels of government that we must get serious about removing lead from our water systems," said Kildee, who has introduced legislation with Sen. Tammy Duckworth (D-Ill.) to lower the lead action level.

The proposed rule does not explain why there is no update to the 15-ppb action level, nor does it explain why 10 ppb should be the trigger level. But it does confirm that neither is a "health-based" standard.

"The EPA is proposing the lead trigger level because the Agency has determined that meaningful reductions in drinking water lead exposure could be achieved by requiring water systems to take a progressive set of actions to reduce lead levels at the tap," the proposal says. "The EPA proposes that 10 [ppb] is a reasonable threshold to require water systems to undertake actions."

Asked to clarify, the EPA official said the agency decided to maintain the 15-ppb action level "because it is based on feasibility of what water systems can achieve."

"The 10 ppb we believe is an appropriate value to trigger a system to both prepare for an exceedance of the action level and take steps to reduce lead levels," the official said.

Southerland argued that, as EPA did in 1991, the new proposal should detail how both the trigger level and the action level will affect the number of children with lead in their blood above the CDC threshold.

"If EPA could calculate that in 1991, then why can't they today, in this new rule, tell us what the equivalent is?" she said.

Advocates hail improvements

Advocates, however, say there are genuine improvements in the new Lead and Copper Rule, including formally outlawing "cheating" techniques utilities used when sampling tap water to make it seem like lead levels were lower than they actually were.

The new rule includes requiring samples to be taken in wide-mouth bottles and prohibits flushing and cleaning or removing faucet aerators before sampling.

The proposal would also be the first to require utilities to test for lead at taps in schools and day care facilities; and would require utilities to

inform communities within 24 hours if the lead action level has been exceeded.

"We want to make sure we are testing under the actual conditions under which people are drinking their water," Wheeler said yesterday when announcing the rule.

Christa Kelleher, an assistant professor of earth sciences and civil engineering at Syracuse University, said those changes are major improvements.

"They are making the goal that information is power; we need better information about the location of lead pipes, better notification to homeowners, and that is coming front and center in these new proposed changes," Kelleher said.

"It is indeed a very good thing," agreed Olga Naidenko, the Environmental Working Group's vice president for science investigations. "It is fair to say it is long overdue to not allow sample cheating."

Questions linger about enforcement

While Wheeler said yesterday that the stricter monitoring requirements are one reason lead pipes will actually be removed at a faster pace under the new rule, experts say they aren't so sure.

Kelleher said she believes there might be enough positive changes in the rule to outweigh the negatives, but she said she doesn't understand why EPA changed the rate of lead pipe replacement.

"Why change that rate?" she said. "The reality is that if we have lead service lines in the ground, we have a population at risk."

Naidenko said that change makes the entire rule vulnerable.

"We agree that the cheating should have been stopped a long time back, but because the proposal doesn't say, 'Let's take the problem out; let's take the lead out,' we are left relying on EPA enforcement on the ground, and that is a big question," she said.

The Trump administration has proposed a modest funding increase for programs that help states and communities pay to remove lead pipes. This winter, EPA also reshuffled its enforcement priorities and created two new initiatives to increase compliance with drinking water standards and reduce children's exposure to lead.

Despite that, advocates note that some aspects of the new lead proposal — including the sampling measures — are logistically difficult to enforce. And multiple public health experts said they are still skeptical that the current administration would actually crack down on enforcing lead drinking water violations when it has stalled enforcement in so many other areas of environmental protection.

EPA won't release the specifics of how states should enforce the new lead rule until after it is finalized. Until then, health experts say, it's difficult to know how impactful the positive sampling changes will be.

"The specific problem with this administration is that they have not really shown themselves as stewards of on-the-ground enforcement, to put it politely," Naidenko said.

As Ronnie Levin, a former EPA staffer who now manages the water and health program at Harvard University's T.H. Chan School of Public Health, said: "This is the Trump EPA, who knows?"

Proposed revisions to the Lead and Copper Rule may be viewed at https://www.epa.gov/ground-water-and-drinking-water/proposed-revisions-lead-and-copper-rule.

Clean Water Act: Greens join legal fray over EPA's dropped Pebble veto threat

(Greenwire, 10/9/2019) **Dylan Brown, E&E News reporter**

More than a dozen environmental groups today sued EPA for canceling a Clean Water Act veto that could have hamstrung Alaska's proposed Pebble mine.

The complaint filed today in the U.S. District Court for the District of Alaska mirrors one brought yesterday by regional groups in Bristol Bay downstream from the proposed copper and gold mine site.

At issue: EPA's decision to withdraw an Obama-era proposed determination under Section 404(c) of the Clean Water Act that preemptively blocked large-scale mining upstream from the world's largest wild sockeye salmon fishery.

EPA Region 10 chief Chris Hladick pulled the 2014 determination after EPA General Counsel Matthew Leopold ordered him to reconsider the veto threat.

"The EPA's attempt to reject its own science-based conclusions is clearly arbitrary and capricious, wholly political, and legally indefensible," Trustees for Alaska senior attorney Katie Strong said in a statement.

Mining company Pebble LP has said the same thing about the Bristol Bay watershed assessment, which backstopped the 2014 restrictions.

In the Hladick order, EPA said the 2014 study was outdated and the agency would wait to see whether its concerns would be fully addressed in the Army Corps of Engineers' ongoing Pebble environmental review.

"We think the suit is without merit as the EPA acted appropriately," Pebble spokesman Mike Heatwole said. "The preemptive action was poor policy to begin with — a precedent that caused alarm among most of Alaska's business and trade organizations regardless of their views about Pebble."

Critics expected the Trump administration to quickly kill the proposed veto under pressure from industry and conservative groups, but EPA started and then stopped its own withdrawal process in 2018. Former EPA chief Scott Pruitt said any mining project will "likely pose a risk" to Bristol Bay.

"EPA was right in 2014 when it first proposed to protect Bristol Bay, and right again in 2018 when it stood by that proposal," Earthjustice attorney Tom Waldo said. "Its cowardly reversal this summer violated the agency's duty to protect an irreplaceable resource and the people who depend on it."

NEPA: A 'modest' impact from a major Tongass National Forest rule?

(Greenwire, 10/18/2019) **Marc Heller, E&E News reporter**

A Trump administration proposal to lift roadless area restrictions on logging and other activities in Alaska's Tongass National Forest would have only a "modest" effect on timber harvesting, according to the Forest Service.

In a proposed rule published in the *Federal Register* yesterday, the agency said only 185,000 acres of the 9.2 million acres targeted for eased restrictions would actually be considered for timber harvest.

A "modest addition of suitable timber acres" would give forest managers more flexibility in selection and design of future timber sales in the Tongass, the Forest Service said.

The proposed rule, followed today by a draft environmental impact statement, elaborates on the Agriculture Department's recommendation to fully exempt the Tongass from the 2001 Roadless Area Conservation Rule, which restricts the construction of roads, logging and other activities in certain areas.

The document will be open for public comment for 60 days, and the Forest Service said it would schedule public hearings in Alaska and Washington, D.C.

At nearly 17 million acres, the Tongass is the biggest national forest in the U.S., and it's one of the planet's last remaining intact temperate rainforests.

It's also an economic engine for southeast Alaska, largely for recreation and tourism but also for a timber industry that has shrunk over several decades.

Exempting the Tongass would help rural economies and the timber industry while leaving more sensitive areas of the forest, such as certain watersheds, free of old-growth logging.

"The overarching goal of the proposed rule is to reach a long-term, durable approach to roadless area management that accommodates the unique biological, social, and economic situation found in and around the Tongass National Forest," the agency said in the proposed rule.

"There is broad agreement that the circumstances of the Tongass National Forest are unique in a number of respects," the Forest Service said. "The Tongass differs from other national forests with respect to size, percentage of roadless areas, amount of [National Forest System] lands and dependency of 32 communities on federal lands, among other Alaska- and Tongass-specific statutory considerations.

"There is not consensus over how to manage the Forest given those unique features," the Forest Service said.

In stating a full exemption as its preferred alternative, USDA — which oversees the Forest Service — sided with Alaska state officials who requested an Alaska-specific rule last year.

The proposed rule said officials gave "substantial weight" to state officials' policy preferences and added that USDA is "acutely aware of the heightened sense of expectation" concerning adjustments to roadless area management on the Tongass.

Environmental and conservation groups, as well as Native Alaska tribes living in and around the Tongass, mainly oppose lifting roadless restrictions, saying additional logging, mining and other activities could harm the environment and threaten fisheries. But the agency said 3.6 million acres in key watersheds would continue to be managed for no old-growth harvesting.

In the draft EIS, the Forest Service said the proposal wouldn't have much impact on commercial fishing, while acknowledging that the alternatives the agency weighed would offer varying levels of protection.

"The future of the fishing industry in Southeast Alaska is more likely to depend upon occurrences outside of the Tongass National Forest such as hatchery production, offshore harvest levels, and changes in ocean conditions," the draft EIS said.

In crafting the proposed rule, the agency considered six alternatives, including making no changes to the roadless rule or lifting restrictions only in certain areas.

The exemption has support from Alaska's congressional delegation, which has pressed the administration for it. When the department earlier this week said it would back a full exemption, Senate Energy and Natural Resources Chairwoman Lisa Murkowski (R-Alaska) thanked officials "for their continued efforts to restore reasonable access to the Tongass National Forest."

"This is important for a wide array of local stakeholders as we seek to create sustainable economies in southeast Alaska," Murkowski said.

The Draft EIS on *Rulemaking for Alaska Roadless Areas* may be viewed at https://www.fs.usda.gov/nfs/11558/www/nepa/109834_FSPLT3_4876629.pdf.

NEPA: Judge blocks 'weakened' sage grouse plans

(Greenwire, 10/17/2019) **Scott Streater, E&E News reporter**

A federal judge has sided with environmental groups challenging revisions to Obama-era greater sage grouse protection plans, approving an order blocking the Bureau of Land Management from implementing the revisions on 51 million acres of grouse habitat.

The preliminary injunction issued late yesterday by Judge B. Lynn Winmill in the U.S. District Court for the District of Idaho blocks implementation of the revisions until litigation challenging them is resolved; the original plans finalized in 2015 "remain in effect during this time," he wrote.

But Winmill, in a sharply worked order, forecasts trouble for the future of the grouse plan revisions, writing that the federal lawsuit filed by environmental groups in March "will likely succeed in showing" that the revisions resulted in "substantial reductions in protections for the sage grouse (compared to the 2015 Plans) without justification."

That statement casts significant doubt on the future of the Trump administration's sage grouse revision efforts begun in 2017 by former Interior Secretary Ryan Zinke and finalized in March by his successor, David Bernhardt.

Oil and gas development will now have to comply with the Obama-era plans that discourage or limit development in sage grouse habitat while the preliminary injunction is in place. But it's not clear how the injunction will affect planned oil and gas leasing on parcels that overlap grouse habitat, nor is it clear how it would affect other projects like transmission lines or roads intersecting habitat for the chicken-sized bird.

The Trump administration could appeal Winmill's order to the 9th U.S. Circuit Court of Appeals. A Department of Justice spokesman did not respond to a request for comment on this story.

The Interior Department released an emailed statement yesterday defending the "common sense amendments" as "legally sound." The statement also noted that Western states "overwhelmingly supported the plans on a bipartisan basis," including support from Colorado Gov. Jared Polis (D) and Wyoming Gov. Mark Gordon (R).

The revised plans, among other things, removed almost all of the 10 million acres of so-called sagebrush focal areas (SFAs), identified in the original plans as habitat critical to the bird's survival. They also added "modifications, exemptions and waivers" to mandates in the Obama blueprint that reduced buffers around sage grouse breeding grounds, and limited no-surface-occupancy requirements and seasonal restrictions near sensitive habitat.

Bernhardt and other Interior officials have said the revisions were needed to remove unnecessary roadblocks hampering energy development, recreation and other uses of federal lands. They also argued the revised plans better align with separate grouse protection plans devised by individual states.

But Winmill found significant fault with the process BLM used to revise the plans. He wrote that the "effect on the ground" of the changes "was to substantially reduce protections for sage grouse without any explanation that the reductions were justified by, say, changes in habitat, improvement in population numbers, or revisions to the best science."

He criticized BLM for not taking a "hard look" at the impacts of the revisions to the grouse as required by the National Environmental Policy Act. While it is "well-within the agency's discretion" to tweak the plans to better align with the individual state plans, that does not absolve it from the hard look mandate required under NEPA, he wrote.

"Certainly, the BLM is entitled to align its actions with the State plans, but when the BLM substantially reduces protections for sage grouse contrary to the best science and the concerns of other agencies, there must be some analysis and justification — a hard look — in the NEPA documents," Winmill, a Clinton appointee, wrote in the 29-page order.

"It is likely that plaintiffs will prevail on their claim that this hard look was not done with respect to all six" final environmental impacts statements that evaluated the grouse plan revisions and were used to justify their finalization in a record of decision issued in March, Winmill wrote.

'The law demands more'

The preliminary injunction is part of the federal lawsuit filed in March by the coalition of groups challenging the sweeping revisions to the 2015 plans that amended 98 BLM and Forest Service land-use plans to incorporate grouse protection measures covering 70 million acres in 10 Western states.

The coalition — the Western Watersheds Project, WildEarth Guardians, the Center for Biological Diversity and the Prairie Hills Audubon Society — separately requested in April the injunction as part of the lawsuit.

The groups, which are represented in the lawsuit by attorneys with Idaho-based Advocates for the West, said the injunction was necessary to protect the bird.

"The Bureau of Land Management deliberately undermined protections for the sage grouse, then had the audacity to claim these rollbacks would not impact the species," said Sarah Stellberg, an attorney with Advocates for the West. "The law demands more. This injunction is critical to protecting the sagebrush steppe and this icon of the American West."

Michael Saul, a senior attorney at the Center for Biological Diversity, singled out Bernhardt, noting that BLM has moved to hold more oil and gas lease sales in sage grouse habitat.

"We're grateful the judge spared the sage grouse from Bernhardt's despicable and illegal plan to open every last acre of their BLM-managed habitat to fracking," Saul said in a statement.

"This ruling gives this beautiful bird a better shot at avoiding extinction."

Erik Molvar, a wildlife biologist and executive director of the Western Watersheds Project, notes the preliminary injunction comes amid evidence that sage grouse populations are "declining West-wide."

Indeed, sage grouse populations in Montana have fallen more than 40% in the past three years, according to the state. Populations have also declined this year in Idaho, Nevada, Oregon and Wyoming, which is home to a third of the remaining grouse.

"Every boost of protection we can get for sage grouse and their habitats helps hundreds of other types of plants and wildlife that depend on the sagebrush sea, from elk to pygmy rabbits to golden eagles," Molvar said.

Grouse vs. 'oil, gas, and mineral extraction'

The injunction follows a ruling by Winmill earlier this month that rejected a request by BLM and the Forest Service to throw out the lawsuit or to break up the lawsuit into several states.

The Forest Service separately revised federal grouse protection plans for 5.2 million acres of grouse habitat on national forest and grasslands, finalizing them last summer. Environmental groups earlier this month filed administrative objections to the Forest Service revisions and are likely to file separate litigation challenging them depending on the outcome of the objections.

BLM, meanwhile, began implementing its revisions once they were finalized in March and has already held oil and gas lease sales that included thousands of acres of sage grouse habitat.

But Winmill's preliminary injunction order suggests the revised sage grouse plans may never be fully implemented without significant change.

"Under these weakened protections, the BLM will be approving oil and gas leases; drilling permits; rights-of-way for roads, pipelines, and powerlines; coal and phosphate mining approvals; and livestock grazing permit

renewals," he wrote. "It is likely that these actions will cause further declines of the sage grouse under the weakened protections of the 2019 Plan Amendments."

Interior and BLM argued against the preliminary injunction, records show, claiming that the revised plans will not cause "irreparable harm."

Winmill disagreed.

"The record shows that the 2019 Plan Amendments were designed to open up more land to oil, gas, and mineral extraction as soon as possible," he wrote. "That was the expressed intent of the Trump Administration and then-Secretary Ryan Zinke. There is no indication that current Secretary David Bernhardt is proceeding at any slower pace."

Lead NEPA Story (*continued from page 1)*

Lawyers for the challengers told the judge that yanking the permits was the only way to ensure the viability of the National Environmental Policy Act, which requires the federal government to examine impacts before carrying out major actions.

"This is not how NEPA is supposed to work," said attorney Bill Eubanks, arguing on behalf of the National Parks Conservation Association.

He pointed to a 2007 case in which the D.C. District Court ordered the Army Corps to deconstruct a flood control project in Mississippi after faulting the agency's NEPA review.

"There is authority for this and precedent for this in this court," Eubanks said, adding that requests by the Army Corps and Dominion to allow the agency to simply revisit its NEPA review are attempts to "plow new ground."

Attorneys for the Army Corps and for the utility argued that vacating the permits could open the door to a takedown of the transmission line.

"We all know what their goal is," Dominion attorney Harry Johnson said of the project challengers. "Their goal is to have the towers down."

Dismantling the project would result in disruption to the electrical supply for Virginia's Hampton Roads area, Johnson said.

After reaching their decision on the NEPA review, judges for the D.C. Circuit expressed frustration with that argument, noting that project proponents had previously said they would remove the towers if they lost the case.

Counsel for the agency said they expect to finish an environmental impact statement for the James River transmission line by spring 2020. Project challengers can lodge any complaints through that process, said Dedra Curteman, one of the DOJ attorneys who represented the Army Corps in yesterday's hearing.

"Plaintiffs should avail themselves of the public process" under NEPA, she said.

Lamberth remarked that the project "is on track for a more speedy environmental review than I have seen in a long time."

The judge said he expected to make a decision on next steps as soon as possible.

The **NAEP *National Desk*** is published every two weeks using content originally published in *Greenwire*. The NAEP *National Desk* is emailed directly to approximately 1,000 NAEP General, Associate, Student, and Senior members, and indirectly to more than 3,100 chapter-affiliate members through 17 state or regional affiliate chapters. News articles are provided through a licensing agreement with Environment and Energy (E&E) Publishing, LLC (www.eenews.net). E&E's five daily online publications are ClimateWire, EnergyWire, E&E Daily, Greenwire and E&E News PM. ***Subscription discounts are available to NAEP members. Sign up for a subscription by sending an email to cchinyata@eenews.net***.

This edition of the National Desk was compiled by Harold Draper. For more information on NAEP, please contact the NAEP office at office@naep.org.

The National Association of Environmental Professionals (NAEP) is a multidisciplinary, professional association dedicated to the promotion of ethical practices, technical competency, and professional standards in the environmental fields. Our members reflect a diversity of employers, including government, industry, academia, consulting firms, and the private sector in the U.S. and abroad. They have access to the most recent developments in environmental practices, research, technology, law and policy.