



September 1, 2006  
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**BY ELECTRONIC MAIL**

NEPA Modernization (EMS-NEPA)

Attn: Associate Director for NEPA Oversight

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Re: Request for Comments on the Proposed Guide to Aligning NEPA and EMS

Dear Associate Director for NEPA Oversight:

The undersigned organizations submit the following comments in response to the request of the Council on Environmental Quality for comments on its proposed guide to "Aligning the Complementary Processes of Environmental Management Systems (EMS) and the National Environmental Policy Act (NEPA)." 71 Fed. Reg. 40520 (Jul. 17, 2006).

The Southern Environmental Law Center is a regional non-profit organization working to conserve natural resources throughout the Southeast. Among many other outstanding resources, the southeast is blessed with abundant public lands, including 4.7 million acres of National Forests in the Southern Appalachian mountains. Our primary work in the matter at hand, along with that of the undersigned, is with the USDA Forest Service. Our comments will primarily address this agency.

The Forest Service recently has overhauled its regulations implementing the National Forest Management Act. 70 Fed. Reg. 1023 (Jan. 5, 2005). These regulations require that each forest establish an EMS conforming to ISO 14001. 36 C.F.R. § 219.5. Among other major changes, the agency also scrapped the requirement that Environmental Impact Statements (EISs) be prepared for the adoption or revision of land and resource management plans, which govern the management of each national forest for 10-15 years, and proposed to categorically exclude (CE) forest plans from NEPA documentation and analysis. 70 Fed. Reg. 1062 (Jan. 5, 2005). We strongly object to many aspects of the revised national forest planning scheme and to the proposal to CE forest plans. This change in Forest Service forest planning procedures informs many of our comments here.

We firmly believe that an EMS is no substitute for the NEPA process of analyzing, considering and disclosing the environmental impacts of proposals and alternatives, and of involving the public in decisions which affect our environment. The proposed guide as written raises significant concerns as to whether the EMS will be used to weaken agency compliance with NEPA. Furthermore, there are critical questions and concerns that must be addressed in regards to compliance with, certification or registration under the ISO 14001 that inform our comments. These will be addressed below. We do, however, want to provide input on how EMS might be used appropriately by the Forest Service and other federal agencies, and how EMS might contribute to the NEPA process.

## **I. Environmental Management Systems Should Complement the Purpose and Function of NEPA.**

As articulated by CEQ, NEPA “is our basic national charter for protecting the environment.” 40 C.F.R. § 1500.1. As such, NEPA was intended to integrate a policy of environmental stewardship into all levels of Federal activity. Agency implementation and judicial interpretation, however, have focused the practical impact of NEPA on the action-forcing mechanism of environmental analysis concurrent with key agency decision. The implementation of well-designed Environmental Management Systems could fulfill some of the broader promise of NEPA by addressing the range of activities that take place between major decision points and by introducing environmental benchmarks, accountability and continuous improvement into the implementation of Federal programs.

Environmental Management Systems must be implemented so that they complement the NEPA process. As the Proposed Guide prepared by CEQ indicates, the NEPA process is a legal requirement that must be integrated into the Environmental Management System. See Proposed Guide at 8; ISO 14001 at 4.3.2. To date, we have not seen the Forest Service do this. This integration must include the identification of significant environmental impacts, implementation of mitigation measures and other environmental commitments.

As noted by the Proposed Guide, environmental impacts identified in the NEPA process should inform the structure of the EMS through the identification of environmental aspects. Proposed Guide at 8. NEPA is a time-tested process for the identification of significant environmental impacts. From the earliest stages of scoping, the NEPA process solicits input from a wide variety of stakeholders on the potential for significant environmental impacts arising from agency activities. See 40 C.F.R. § 1501.7; 40 C.F.R. Part 1503. The EMS should be revised periodically to incorporate new environmental aspects as new NEPA processes are completed, implicating environmental impacts not previously considered by the EMS. Because EMS has a different purpose than NEPA, however, significant environmental impacts identified by the NEPA process may not fall within the scope of EMS. As discussed below, the EMS itself must not be allowed to have a limited scope that excludes whole categories of environmental impacts. For these reasons, the EMS and NEPA processes for identifying significant environmental impacts must be conducted independently, but the result of each process should be used to inform the other.

Monitoring conducted pursuant to an EMS can also inform future NEPA processes, if properly designed. In particular, many agencies rely on the potential for best management practices (BMPs) to reduce environmental impacts of agency activities. To the extent that BMPs are required by law or otherwise are adopted by the agency, they must be made part of the EMS. The focused attention that an EMS can bring to bear on the outcome achieved by such BMPs can improve significantly the reliability of assumptions made in future NEPA processes. Such data also could serve as a basis for altering and improving management practices through corrective action.

Furthermore, integration of environmental requirements and mitigation protocols with the EMS is required by ISO 14001. Compliance with mitigation and avoidance measures identified in a ROD or FONSI is legally required and must be factored into the objectives and targets of the EMS. If mitigation measures prove inadequate, EMS provides the structure for identifying failures and taking corrective action. In addition to addressing failures in mitigation, the auditing (if independent and external) and verification protocols of ISO 14001 will generate data about the effectiveness of mitigation procedures and the extent of cumulative impacts from agency action. That information will better inform the agency and the public in the next round of NEPA decision making.

EMS also could serve as the basis for beneficial use of adaptive management. At its best, adaptive management enables an agency to compare actual outcomes to its desired conditions and change course as necessary. Under current practice, agencies have little incentive or opportunity for such an assessment. With respect to programmatic NEPA decisions, in particular, EMS can provide the structure for comparing the long-term desired conditions with the actual outcome of measures adopted with the hope of achieving those conditions. ISO 14001 is designed to capture just this sort of question. The ISO 14001 standards direct the organization to identify all legal requirements applicable to its activities but also “other requirements to which the organization subscribes.” ISO 14001 at 4.3.2. These requirements, both legal and otherwise, provide the basis for the identification of objectives and targets which, in turn, are the benchmarks against which agency action is compared. In the case of a forest plan prepared by the US Forest Service, for example, the desired conditions identified by the plan are “other requirements to which the organization subscribes,” and the EMS should incorporate objectives and targets that measure progress towards achievement of those desired conditions.

At its worst, however, adaptive management could be little more than an opportunity to defer difficult questions about environmental impacts until after the close of the NEPA process. The interaction between NEPA and EMS must not become an excuse for downplaying at the NEPA decision making phase the risk of environmental impacts or of failed mitigation. The promise of adaptive management must not be used at the decision phase to camouflage inadequate analysis and assessment of risks in the NEPA process.

That result would undermine consideration of other alternatives. Instead of a NEPA process that provides the information and opportunity to strike an intelligent balance between risks, adaptive management in the NEPA context could foster a hit-and-miss approach to mitigation that downplays risks at the decision making phase only to augment mitigation after the fact – after environmental damage has been done. Such an approach contradicts CEQ procedures for dealing with uncertain information about impacts. 40 C.F.R. § 1502.22. The consequences of lowering the standard for evaluation of risk at the decision making phase could be greater environmental impacts, over the long run, as agencies repeatedly miss their mitigation targets, only to reevaluate and take corrective action after the fact. It is questionable, given poor agency history in conducting timely and adequate monitoring and evaluation, and the lack of post-project implementation evaluation of agency effectiveness, whether reevaluation and corrective action after the fact would even take place. The integration of NEPA and EMS must be undertaken carefully so that risks and environmental impacts are considered fully during the NEPA process when alternative courses of action, including the no action alternative, are still under consideration.

## **II. Environmental Management Systems Cannot Fulfill The Action-Forcing Function of the NEPA Process.**

CEQ has asked for comments addressing the possibility that a “well-constructed EMS can include all the elements of the NEPA process and serve as the basis for complying with NEPA requirements.” Although there is real promise for employing EMS as a compliment to the NEPA decision making process that ensures environmental policy and programs are adequately implemented, EMS is not a substitute for the public process and analysis of environmental impacts and alternatives required by NEPA.

An EMS for a federal agency, if properly designed, should serve many of the purposes of the National Environmental Policy Act, but the EMS serves a fundamentally different function than the “detailed statement” required by NEPA. The “NEPA process” as defined by CEQ regulations and judicial interpretation ensures that agency decisions provide full consideration to the environment, carefully weigh a range of alternatives in light of their environmental impacts, including the cumulative impact of agency action together with independent impacts, and benefit from the insight and input of the interested public. As one court eloquently has explained:

“Under NEPA, before making a decision that will affect the environment, an agency must take into account the effects of its action on the environment, providing notice and opportunity to be heard, and fair and impartial consideration. Nature lacks a voice with which to speak for itself. Recognizing this, Congress has charged under federal law that agencies listen to the interests of the environment. This process invites the agency to act as a steward and trustee for not only the best interests of the government and its considered action, but for the effects of this action on the environment. This role is complimented by the opportunity for individuals and organizations to participate in the environmental deliberations affecting government action. . . .” Wash. County v. United States Dep't of the Navy, 317 F. Supp. 2d 626, 631 (D.N.C. 2004).

An environmental management system includes none of these elements. Instead, EMS provides a structure to implement the range of environmental policies and decisions embraced by an agency, including NEPA obligations. Further, EMS is so flexible and internally defined that there is little assurance that any given EMS will fully serve this purpose.

As one commentator explained:

ISO 14001 does not itself define substantive performance measures and outcomes, or specific direction on how to best manage the agency programs: that direction is provided by laws, regulations, best management practices, and agency policies. ISO 14001 provides a credible framework for identifying and meeting the legal and other obligations that are established through the public process, it does not pretend to intrude upon authorities of government agencies to define goals for environmental performance. The ISO 14001 standard was never intended to replace or be implemented outside of the legal and political context that establishes environmental policy. Therefore, an ISO 14001 EMS does not replace NEPA, but rather provides a systematic framework for effectively identifying and meeting NEPA obligations.

Environmental Management Systems and NEPA: A Framework for Productive Harmony, Edward A. Boling, 35 ELR 10022, 10026 (2005).

NEPA requires a number of core elements that are not part of the EMS structure. NEPA is an action-forcing statute designed to ensure that agency decision making balances environmental impacts against other priorities. The Supreme Court has explained that “NEPA has twin aims. First, it ‘places upon an agency the obligation to consider every significant aspect of the environmental impact of a proposed action.’ . . . Second, it ensures that the agency will inform the public that it has indeed considered environmental concerns in its decisionmaking process.” Balt. Gas & Elec. Co. v. NRDC, 462 U.S. 87, 97 (U.S. 1983) (internal citations omitted). There is no requirement that EMS satisfy either aim.

The NEPA process improves the environmental stewardship of Federal agencies by forcing them to consider each proposal for action together with a range of alternatives, including a no action alternative. As a result, the consideration of alternatives is “the heart of the environmental impact statement.” 40 C.F.R. § 1502.14. The requirement to explore a range of alternative courses of action and carefully to compare the merits of each alternative with full consideration of environmental impacts is not a part of the EMS structure and is entirely absent from the ISO 14001 protocols. Nor does EMS require agencies to consider mitigation measures and less damaging alternatives. See 40 C.F.R. § 1502.14(f), § 1502.16(h). Because EMS is designed to ensure adequate implementation of environmental policies and programs, it provides a structure for implementing decisions reached through the NEPA process or through other procedures, but provides no mechanism for the careful environmental decision making provided by the NEPA process.

EMS, therefore, cannot provide a sound basis for decisions which require agencies to weigh environmental impacts with other needs. For example, analysis under the NEPA process is needed for the Forest Service to make an informed choice about the appropriate balance between the many possible uses (water, fish and wildlife, recreation, timber, etc.) of a single national forest or an area of a forest. While EMS cannot provide the sole basis for a decision on how many trees to cut in which areas, it could provide a structure for determining whether the designated trees were cut and what the impacts were, information which could inform NEPA analysis of similar decisions in the future.

ISO 14001 requires each organization to identify environmental aspects of the organization's activities that lead to environmental impacts. ISO 14001 4.3.1. Aspects that have significant impacts on the environment are identified as significant environmental aspects. Much of the EMS system is designed around the monitoring of and implementation of operational controls to address impacts from significant environmental aspects.<sup>1</sup>

In several respects, however, this procedure falls short of the impact analysis required under NEPA. EMS provides a more narrow view of environmental impacts. ISO 14001 does not mandate the consideration of all environmental aspects and environmental impacts, but only those "within the defined scope of the environmental management system that it can control and those that it can influence." ISO 14001 4.3.1.

As a result, there is no guarantee that an impact "significantly affecting the quality of the human environment" will be identified under EMS if it is not within the "defined scope" of the EMS. Nothing on the face of ISO 14001 or any federal law or policy requires agencies to apply EMS to all their activities. In addition, agencies should first analyze environmental impacts under NEPA so they can learn what environmental aspects EMS should include.

We are concerned that the Forest Service may not intend to include all land management activities in EMS. For example, recent efforts by the Uwharrie National Forest (NC) to implement Environmental Management Systems began with a discussion whether the vegetation management aspects of Forest Service operations (i.e. logging) should be included in the EMS. Staff on the George Washington National Forest (VA) have verbally indicated that they do not view EMS as a comprehensive monitoring plan for the forest, and that the forest's EMS may initially include only one or two issues. One or two aspects simply cannot meaningfully track the environmental impacts of managing this complex forest which (with the adjacent Jefferson National Forest) spans nearly 1.8 million acres of public land, receives several million visitors annually, supports many federally-listed threatened and endangered species, and promotes a substantial timber program (26.1 MMBF in 2005).

Furthermore, the EMS requirements provide no mechanism for consideration of impacts beyond the control of the agency. The ISO 14001 procedures define environmental impact as "any change to the

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<sup>1</sup> As the CEQ recognizes, the ISO 14001 does not define "significant." Proposed Guide at 2, fn.5. This creates the risk that environmental impacts which are "significant" under NEPA might be excluded from the scope of the EMS, as agency arguments and practice to date show. To be meaningful, EMS must include all potentially "significant" environmental impacts. In the case of the Forest Service, EMS also must monitor the impacts on all forest resources, including but not limited to fish and wildlife, water, soil and air resources, hunting, fishing and outdoor recreation of all kinds, even if the agency believes its actions will not "significantly" affect those resources. This comprehensive monitoring will be even more important if the Forest Service CE's forest plans, because there would be no plan-level EIS to identify significant environmental effects, nor to tier to, and all environmental analysis would be pushed to the project level.

environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects." ISO 14001:2004(E) at 3.7. Environmental aspects, in turn, are defined as elements "of an organization's activities or products or services that can interact with the environment." ISO 14001:2004(E) at 3.6. The standards are clear that the organization is required to identify only those environmental aspects "that it can control and those that it can influence." ISO 14001 4.3.1.

NEPA requires more. Because of NEPA's focus on incorporating environmental policies into the project and program decision making process, NEPA and CEQ regulations mandate that the impact of agency actions be considered cumulatively with other impacts to the human environment "regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. Therefore, in the context of National Forest management, relying solely on EMS, with its limited scope, likely would result in overlooking the "synergistic effects from implementation of the Plan as a whole," Resources Ltd. v. Robertson, 35 F.3d 1300, 1306. (9th Cir. 1994).

In addition, the CEQ regulations further require that the NEPA process include "alternatives not within the jurisdiction of the lead agency." 40 C.F.R. § 1502.14(c); see, e.g., National Wildlife Fed'n v. National Marine Fisheries Serv., 2002 U.S. Dist. LEXIS 24076, \*17-24, \*43-44 (W.D. Wash. Dec. 12, 2002) (Reasonable alternatives may not be rejected because they would require Congressional authorization or do not completely solve the problem.). These requirements are the result of NEPA's role as an action-forcing statute, designed to inform a thorough decision about the wisdom of an agency action in light of its environmental impacts and to spark thoughtful exploration of alternatives, even if they affect entities beyond the agency and beyond the agency's control.

Partly because of this flexible scope and lack of cumulative impacts analysis, we are concerned about the CEQ's suggestion that EMS may be used to identify additional categorical exclusions (CEs). The Forest Service already is over-using CEs. For example, National Forests in the Southern Appalachians almost invariably CE every prescribed (intentional) burn, so that tens of thousands of acres of burning escapes environmental review.<sup>2</sup> While EMS could help implement badly needed monitoring of these effects, monitoring must examine relevant elements or EMS might be abused to support an erroneous conclusion that burning is having no impact on the forest.

Finally, the EMS makes no provision for public participation. Although the draft guide notes that organizations have "discretion about communicating externally on significant environmental aspects," Proposed Guide at 10, the EMS structure does not require such communication. ISO 14001 provides only that organizations should implement a procedure for receiving, documenting and responding to "relevant communications" from interested parties. ISO 14001 at A.4.3. Furthermore, the EMS provides no assurance that information collected in support of an environmental analysis will be made available to the public. Instead, ISO 14001 concedes only that "in some circumstances" responses to interested parties' concerns may include relevant information about environmental aspects and impacts associated with the organization's operations.

NEPA, in contrast, specifically requires that environmental documentation be shared with the public. NEPA "guarantees that the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision." Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 349 (U.S. 1989); see generally 4 C.F.R. § 1501.7; 40 C.F.R. Part 1503 (Following statutory direction, CEQ regulations provide for public participation at the scoping and comment phases of decision making.). Public participation in agency

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<sup>2</sup> For example, in 2004 alone, the Cherokee National Forest (TN) prescribed burned over 20,000 acres. In 2004, the George Washington and Jefferson National Forests (VA) prescribed burned over 13,000 acres.

decision making is core to the action-forcing mechanism of NEPA and ensures that all relevant environmental impacts and alternatives have been presented to and considered by the agency.

The Proposed Guide recognizes that EMS involves “self-monitoring” (p.2) and “internal audits” (p.15). Federal agencies, especially the Forest Service which manages millions of acres of public land, are public stewards of the environment, therefore, monitoring data and audits must be made publicly available. For federal agencies, it will not be sufficient for “senior management” (p.15) to review this internally.

Several researchers have identified the corporate culture as the single biggest obstacle to the potential of an EMS to effect positive change. As one researcher notes, “[g]enuine, lasting cultural change is difficult to bring about in any organization.” Moreover, EMS standards, including ISO 14001, “do not require firms to make dramatic changes or to abandon old ways of thinking about environmental responsibility... Many firms may use EMSs to simply document current practices, not transform practices.”<sup>3</sup> The fact that the Forest Service and other federal bureaucracies have proven themselves generally resistant to real, lasting change makes it essential that audits be performed by trained and independent persons and that public scrutiny be brought to bear on federal agencies’ EMS.

### **III. Implications of the Proposed Guide and Agency Action and Experience**

The proposed guide implies that certain activities will take place, implemented by each agency. The overall focus of this guide implies and assumes that the Forest Service will incorporate the NEPA process into EMS objectives and targets. But this assumes that the agency will choose environmental aspects that pertain to NEPA actions. To date this does not seem to be the case. Those few forests that have taken any action on their EMS seem to view the whole EMS process as an experiment that allows them to pick a few inconsequential environmental aspects and “see how it goes” before including anything more extensive. Agency direction requires an EMS be in place before a forest plan under the new regulations is approved. Those forests that have taken action have interpreted this requirement quite liberally. As long as the Forest Service has the ability to choose any environmental aspect as the focus of their EMS without penalty or repercussion, no matter how minor or limited (for example, hypothetically, the disposition of empty timber marking paint cans), the EMS will be meaningless in its implementation. In order to ensure the NEPA and EMS processes are integrated, CEQ must explicitly require it.

The proposed guide also implies that the Forest Service makes and carries through on mitigation commitments, monitors their effectiveness and engages in broad based forest-wide monitoring and evaluation. Past history indicates this has not always been the case. Recent developments are more disturbing. Most recent Land and Resource Management Plans (Forest Plans) have made significant adverse changes to how, when and whether monitoring and evaluation takes place. First of all, many monitoring questions and measures have been moved out of the Forest Plan into as yet unwritten Monitoring Implementation Plans, no longer subject to NEPA. Monitoring, evaluation and reporting have been clearly explained as separate activities, each with its own schedules and priorities. Monitoring is commonly placed on an annual schedule, but evaluation of that data has most often been moved to an every five years schedule. Reporting requirements are similarly lengthened with a comprehensive report required only every 5 years. Annual reporting is described as simply a laundry list of activities. Some

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<sup>3</sup> Coglianese, Cary and Jennifer Nash, “Environmental Management Systems and the New Policy Agenda,” pp. 13-14, *Regulating from the Inside* (Resources for the Future 2001); see also Gallagher, Deborah Rigling, “Many Shades of Green: How do Internal and External Stakeholders Influence the Types of Environmental Management Systems that Facilities Develop?”, presented at the Twenty-Second Annual Research Conference for the Association for Public Policy Analysis and Management (Nov. 2-4, 2000).

Forest Plans have also been explicit that all of the above is dependent on adequate funding, with monitoring being done first, evaluation being done if there is money and reporting done only if additional funds are available. This is all the more disturbing in concert with the agency shift to adaptive management. The onus will be on the Forest Service to prove to CEQ and, more importantly, to the public that it has integrated monitoring and preventative and corrective action into its daily land management activities, as EMS dictates.

In addition, the proposed guide encourages EMS and NEPA practitioners to work together. We have also seen guidance from other agencies to the Forest Service to make sure that EMS does not become the sole responsibility of the NEPA and forest planning shops. They counsel that EMS must become everyone's responsibility. Forest Service activity to date has not been encouraging on this front. EMS responsibility rests squarely on the shoulders of NEPA and planning practitioners. In many cases, NEPA and EMS staffs are one and the same. This occurs because the 2005 NFMA regulations require that EMS be created before a Forest Plan can be approved and because of how agency funds are disbursed. This problem may be able to be addressed through the auditing function, but CEQ will again have to be explicit in its direction.

Overall, without explicit direction or requirement we fear that in the case of the Forest Service, inaction, neglect or the least possible fulfillment of EMS elements will occur. Commitment to action in the Forest Service revolves around several critical elements: 1) funds to pay for the activity; 2) a specific target for accomplishment and 3) a requirement or penalties for non-performance. Without these required elements, given shortages of funds and staff, other priorities will win out.

The guide points out that corrective and preventive action and documentation control are critical elements of an EMS. Corrective and preventive action have never been agency wide management functions and will require a whole new commitment on the part of the Forest Service. Documentation and document control have almost always been weak spots with the agency. Compliance with federal recordkeeping and National Archive requirements has been abysmal as review of financial accounting problems has shown. Again, we point to the three critical elements for agency action above. Unless the CEQ can ensure at a minimum penalties for non-performance, the EMS is doomed to inadequacy.

All of these problems point to several critical questions and concerns that must be addressed:

- Accountability must be ensured. Without public participation this will not occur. We also object strongly to the self-auditing interpretation of the ISO the agency has made. Outside independent auditing must be a requirement. One of the hallmarks of the Forest Service has been the mobility of agency employees. Given the number of forests that employees typically serve on, finding a truly independent employee is difficult. Defining independent auditing as an audit by another forest or agency unit, therefore, would be a sham.
- Will certification or registration under ISO 14001 be required? Is the federal government "playing" at ISO compliance or will the various agencies and programs be required to meet ISO standards? What penalties for non-compliance or non-performance will there be? Flexibility can be a good thing, but accountability is a central tenet of the ISO. CEQ must set at least the minimum standards for compliance or direct full compliance (and registration) with the ISO 14001.

In conclusion, we request that the CEQ revise the proposed guide to address these issues and to clarify the NEPA obligations of federal agencies adopting EMS. Thank you for your consideration.

Sincerely,



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