

June 13, 2023

Honorable Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Honorable Undersecretary Xochitl Torres Small
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Vilsack and Undersecretary Torres Small:

We write today to express concerns about changes to the Rural Energy for America Program (REAP) announced in USDA's March 31 Solicitation for Applications that will exacerbate environmental injustice in many rural communities. We are especially concerned that the larger grant sizes and new scoring criteria will advantage manure digesters and wood biomass facilities and systematically locate them in already overburdened communities. We respectfully ask Rural Development to develop new scoring criteria with input from impacted communities and conduct a new NEPA analysis before soliciting applications for the next application window to ensure the substantial investment into REAP from the Inflation Reduction Act effectively mitigates climate change and centers environmental justice.

REAP can play a vital role in ensuring that rural communities and small family farmers are included in a just transition to renewable energy. Most of the projects funded by REAP, such as for solar and wind installation and making energy efficiency upgrades to buildings, are worthy taxpayer investments. However, REAP has also funded livestock biogas and wood biomass projects that have harmful health and environmental impacts on the communities in which they are located.

I. Manure biogas projects funded by REAP will harm surrounding communities.

The production and combustion of manure biogas creates environmental injustices at every stage of the process. Factory farm gas entrenches the polluting factory farm system, and its massive climate impact, with a false solution to methane emissions that, in reality, is just another source of dirty energy.¹ The liquefied manure management system commonly used by industrial hog and dairy operations creates football field-sized lagoons of manure, which contain high concentrations of nitrogen, phosphorus, pathogens, and heavy metals.² The run-off from land-

¹ Lazenby, R. (2022). *Rethinking Manure Biogas: Policy Considerations to Promote Equity and Protect the Climate and Environment*. Retrieved May 11, 2023, from <https://www.vermontlaw.edu/academics/centers-and-programs/center-for-agriculture-and-food-systems/reports/manure-biogas>

² Marks, R. (2001). *Cesspools of Shame*. Retrieved from <https://www.nrdc.org/sites/default/files/cesspools.pdf>

applied waste creates toxic wastewater that runs into nearby rivers, lakes, and streams.³ The risk of contaminating surrounding water and soil increases when biogas producers cover unlined lagoons to increase the amount of methane they capture.⁴ The anaerobic digestion process makes the nitrogen more water soluble and increases the risk of contaminants seeping into groundwater.⁵

Surrounding communities experience higher cases and severity of respiratory illnesses, as well as nausea, headaches, and other health conditions.⁶ The ammonia and hydrogen sulfide emissions from industrial animal facilities have been linked with higher rates of infant mortality and surrounding communities suffer from decreased life expectancy.⁷ Volatile organic compounds, nitrogen oxides, and ammonia act as ozone and PM2.5 precursors, which inflict significant harm on polluted air basins like the San Joaquin Valley in California where CAFO dairy operations are the largest source of VOC and ammonia.⁸ Methane digesters do nothing to limit these emissions (and in fact, can increase ammonia emissions⁹), while incentivizing operations to expand in size or to use inferior manure management practices in order to generate more manure and profit from producing biogas.

While the harms of factory farm gas production are well-established, the supposed climate benefits are dubious. Liquefying manure and the resulting methane pollution comes from a production decision to maximize herd sizes and manure generation in the industrial model of corporate-controlled agriculture.¹⁰ As many states have no air monitoring requirements for livestock biogas operations, methane leakage from digesters can rapidly diminish any potential climate benefits.¹¹ This leakage increases with clustered factory farm gas facilities for pipeline injection, which require an environmentally devastating network of pipelines. The leakage from these pipelines increases air pollution, and the associated health detriments, on already overburdened frontline communities. In cases where biogas is collected and transported via

³ Burkholder, J., Libra, B., Weyer, P., Heathcote, S., Kolpin, D., Thome, P. S., & Wichman, M. (2007). Impacts of Waste from Concentrated Animal Feeding Operations on Water Quality. *Environmental Health Perspectives*, 115(2), 308–312. <https://doi.org/10.1289/ehp.8839>; see also Natural Resources Conservation Service, U.S. Department of Agriculture, Conservation Practice Standard No. 366, Anaerobic Digester (June 2017), https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1254996.pdf.

⁴ D. Lee Miller & Ryke Longest, *Reconciling Environmental Justice with Climate Change Mitigation: A Case Study of NC Swine CAFOs*, 21 Vt. J. Evtl. L. 523, 540 (2019).

⁵ Natural Resources Conservation Service, U.S. Department of Agriculture, Conservation Practice Standard No. 366, Anaerobic Digester (June 2017), https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1254996.pdf.

⁶ Casey JA, Kim BF, Larsen J, Price LB, Nachman KE. Industrial Food Animal Production and Community Health. *Curr. Environ Health Rep.* 2015 Sep;2(3):259-71. Available at <https://www.ncbi.nlm.nih.gov/pubmed/26231503>.

⁷ Kravchenko, J., Rhew, S. H., Akushevich, I., Agarwal, P., & Lyerly, H. K. (2018). Mortality and Health Outcomes in North Carolina Communities Located in Close Proximity to Hog Concentrated Animal Feeding Operations. *North Carolina Medical Journal*, 79(5), 278–288. <https://doi.org/10.18043/ncm.79.5.278>

⁸ Cody J. Howard, et al., *Reactive Organic Gas Emissions from Livestock Feed Contribute Significantly to Ozone production in Central California*, 44 ENV'T SCI. TECHNOL. 7 2309–2314 (2010), <https://pubs.acs.org/doi/abs/10.1021/es902864u>; and SAN JOAQUIN VALLEY AIR CONTROL DIST., 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards, Appendix B and Appendix G, available at <http://valleyair.org/pmplans/documents/2018/pm-plan-adopted/B.pdf> and <http://valleyair.org/pmplans/documents/2018/pm-plan-adopted/G.pdf>.

⁹ Holly, M. A., Larson, R. A., Powell, J. M., Ruark, M. D., & Aguirre-Villegas, H. (2017). Greenhouse gas and ammonia emissions from digested and separated dairy manure during storage and after land application. *Agriculture, Ecosystems & Environment*, 239, 410–419. <https://doi.org/10.1016/j.agee.2017.02.007>

¹⁰ See, e.g., Phred Dvorak, *California's Green-Energy Subsidies Spur a Gold Rush in Cow Manure, A lucrative state incentive to make natural gas from dairy waste is attracting companies from Amazon to Chevron*, Wall Street J. (Feb. 19, 2022), <https://www.wsj.com/articles/californias-green-energy-subsidies-spur-a-gold-rush-in-cow-manure-11645279200>.

¹¹ Adam Wagner, *'Really terrible science experiment' leads to weeks-long spill from NC hog-waste lagoon*, The News & Observer (Sep. 6, 2022), see also, Sound Rivers, *Wayne Co. toxic spill exposes lack of NCDEQ transparency* (Sep. 7, 2022), <https://soundrivers.org/wayne-co-toxic-spill-exposes-lack-of-ncdeq-transparency/> (the spill was likely closer to 3 million gallons of nutrient- and bacteria-laden foam; 37,400 gallons was the number initially cited by the facility in its public notice, but months later they stated that the actual number was approximately 3 million gallons).

highly polluting trucks, local communities will suffer additional health burdens from compromised air quality.

In addition, much of the proposed expansion would cross fragile ecosystems, such as wetlands in North Carolina that provide important flooding protection and clean water to nearby communities and creeks and rivers in Iowa and Wisconsin, which have already experienced digester-related spills polluting their waterways.

In addition to the devastating impacts of producing and transporting factory farm gas, burning it to produce electricity creates even more pollution for neighboring communities, if burned onsite, or for communities living near biogas processing facilities. For instance, combusting factory farm gas onsite for electricity at 25 facilities would emit more nitrogen oxides, sulfur oxides, and VOC than a modern gas-fired plant, while producing less than five percent of the electricity.¹² This fuel is thus not the “clean” alternative that the industrial livestock industry claims it to be. The transition away from fossil fuels should not rely on even dirtier sources of energy.

Manure biogas projects are notoriously expensive, and increasing the maximum grant sizes under the Program will systematically advantage these projects, taking resources away from smaller producers and proven renewable energy projects. Advantaging the largest CAFOs will also exacerbate the unfair playing field for small-scale producers and industry consolidation that USDA has pledged to address.

Even more insidious, the new scoring criteria are specifically designed to put new methane digesters and other factory farm gas infrastructure in already disadvantaged and distressed communities who will likely suffer even more from the installation of this technology.

II. Wood biomass energy projects funded by REAP will harm surrounding communities.

For far too long, wood biomass has been incentivized as renewable energy and falsely ascribed as ‘carbon neutral.’ This claim has no basis in science – the EPA’s Science Advisory Board, the IPCC, and numerous other scientific bodies are clear that burning wood should not be assumed carbon neutral.¹³ In reality, woody biomass energy (whether for heat or electricity) emits far more CO₂ and other pollutants per unit of energy generated than fossil fuels.¹⁴ Significant emissions impacts are associated with every step along the supply chain, from harvesting, processing, transporting, storing, and ultimately burning wood biomass fuels.

¹² San Joaquin Valley Unified Air Pollution Control District permitting documents allow for this comparison of emissions after the imposition of pollution control requirements, available at [http://www.valleyair.org/notices/Docs/2016/03-22-16_\(S-1143770\)/S1143770.pdf](http://www.valleyair.org/notices/Docs/2016/03-22-16_(S-1143770)/S1143770.pdf); [https://valleyair.org/notices/Docs/2010/12-17-10%20\(C-1100751\)/Public%20Notice%20Package.pdf](https://valleyair.org/notices/Docs/2010/12-17-10%20(C-1100751)/Public%20Notice%20Package.pdf). Even if the factory farm gas was combusted at a power plant rather than on-site, the community near the plant would suffer PM_{2.5} and nitrogen dioxide pollution.

¹³ Beddington, J. et al. Letter from scientists to the EU parliament regarding forest biomass. Available at: <http://empowerplants.files.wordpress.com/2018/01/scientist-letter-on-eu-forest-biomass-796-signatories-as-of-january-16-2018.pdf> (2018); IPCC Task Force on National Greenhouse Gas Inventories, Frequently Asked Questions, Q2-10 <https://www.ipcc-nggip.iges.or.jp/faq/faq.html>; USEPA Science Advisory Board (3/5/19), “SAB review of Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources (2014),” <https://sab.epa.gov/ords/sab/f?p=114:12:14471656505544>

¹⁴ Booth, MS (2014). Trees, Trash, and Toxics: How Biomass Energy Has Become the New Coal <https://www.pfpi.net/wp-content/uploads/2023/01/PFPI-Trees-Trash-Toxics-Biomass-is-the-New-Coal-April-2-2014.pdf>

Burning wood for energy has the dual impact of immediately releasing tons of carbon that would have otherwise remained sequestered in the longer carbon cycle of trees while also reducing the capacity of our forests to naturally sequester additional carbon from the atmosphere. It can take over a century for forests to regrow and absorb the same amount of carbon that is instantly released through burning woody biomass, and this regrowth is not guaranteed. It is important to note that even if the industry claims of only burning logging byproducts and forestry residues were true, burning any type of wood to generate electricity, including residues (unless they would have been burned for disposal anyway), results in a carbon debt of over a century compared to natural gas.¹⁵ The more appropriate comparison to wind or solar further underlines the significance of the climate cost of burning wood.

In addition to the dramatic climate cost of burning wood for energy, this combustion emits substantial amounts of harmful air emissions, including fine particulate matter (PM2.5), volatile organic compounds, heavy metals, and other hazardous air pollutants – all of which inflict disparate harm on Black, Indigenous, Latino, and other communities of color by creating higher risks of asthma, heart attacks, stroke, and other diseases.¹⁶ In many states, wood and biomass have the dubious distinction of surpassing coal as the leading fuel source of PM2.5 mortalities.¹⁷ For these reasons, the Justice40 report specifically identifies industrial scale bioenergy and biomass incineration as “examples of the types of projects that will not benefit a community.”¹⁸

The harms of burning wood biomass are not limited to combustion, as each step in the chain of biomass energy production – including logging, fuel processing, transportation, fuel storage, and handling – also create significant greenhouse gas emissions and other pollution in surrounding communities. Logging, which has intensified due to demand for biomass feedstocks, remains the largest source of emissions from the forest sector.¹⁹ Wood pellet mills emit large quantities of particulate matter, nitrogen oxides, volatile organic compounds, and other hazardous air pollutants, and further impact surrounding communities and people living along transportation routes with dust, noise, fumes, and diesel exhaust. It has been well documented that the wood pellet industry, particularly the large manufacturing facilities in the U.S. Southeast that produce wood pellets for export to Europe and Asia, disproportionately impact environmental justice communities.²⁰

¹⁵ Laganieri, J. et al. Range and uncertainties in estimating delays in greenhouse gas mitigation potential of forest bioenergy sourced from Canadian forests, *GCB Bioenergy* (2017)9, 358–369, at <https://onlinelibrary.wiley.com/doi/epdf/10.1111/gcbb.12327>

¹⁶ Partnership for Policy Integrity <https://www.pfpi.net/wp-content/uploads/2014/04/PFPI-Biomass-is-the-New-Coal-April-2-2014.pdf>. See also Tessum, C.W., D.A. Paoletta, S.E. Chambliss, J.S. Apte, J.D. Hill, and J.D. Marshall. 2021. PM 2.5 polluters disproportionately and systemically affect people of color in the United States. *Science Advances* 28 APR 2021:EABF4491.

¹⁷ Jonathan J Buonocore, Parichehr Salimifard, Drew R Michanowicz, and Joseph G Allen, “A decade of the U.S. energy mix transitioning away from coal: historical reconstruction of the reductions in the public health burden of energy,” 16 *Environmental Research Letters* (2021). <https://iopscience.iop.org/article/10.1088/1748-9326/abe74c>

¹⁸ White House Environmental Justice Advisory Council, Final Recommendations: Justice40 Climate and Economic Justice Screening Tool & Executive Order 12898 Revisions, May 21, 2021, p. 59, at <https://www.epa.gov/sites/default/files/2021-05/documents/whiteh2.pdf>

¹⁹ John Talberth, Climate impacts of industrial forest practices in North Carolina: Synthesis of best available science and implications for forest carbon policy, Sept. 2019, at <https://media.dogwoodalliance.org/wp-content/uploads/2019/09/Climate-Impacts-of-Industrial-Forest-Practices-in-NC-web.pdf>

²⁰ Koester, S. and S. Davis. 2018. Siting of wood pellet production facilities in environmental justice communities in the southeastern United States. *Environmental Justice* Vol. 11, No. 2; See also <https://scalawagmagazine.org/2020/10/wood-pellet-environmental-racism-part-one/>; <https://scalawagmagazine.org/2020/10/wood-pellet-environmental-racism-part-two/>

Given the mandate from the Biden Administration to ensure programs like REAP are administered in a way that centers environmental justice, it is highly problematic that USDA has granted funding to wood biomass projects and is prioritizing projects located in disadvantaged communities. These types of projects have a documented negative impact on the health of surrounding communities and will only hasten the climate crisis.

III. USDA's application of Justice40 to REAP is entirely backwards and will exacerbate environmental injustices.

We strongly support the intent of Justice40 “to deliver 40 percent of the overall benefits of certain Federal investments [to] disadvantaged communities that are marginalized, underserved, and overburdened by pollution.” USDA's application of Justice40 to REAP, however, is a complete bastardization of Justice40 and the core principles of environmental justice.

First, the proposed application evaluation process does not include any mechanism for community input or feedback. Communities have had and will have no voice in which projects may be beneficial, which are neutral, and which are harmful. USDA will rely solely on information provided from applicants and has no proposed process for verifying their environmental claims or soliciting community input before or after projects are implemented.

Second, USDA's proposal wrongly assumes that any project funded under REAP would provide benefits to disadvantaged and distressed communities. As we have laid out in this letter, manure biogas and wood biomass projects are harmful to the communities in which they are located. USDA's proposed scoring criteria will result in an even greater proportion of these projects locating in disadvantaged and distressed communities, exacerbating existing environmental injustices.

Third, this application of Justice40 will do nothing to right the wrongs of USDA's long legacy of discrimination toward socially disadvantaged producers. The scoring criteria do not consider whether the applicants are socially disadvantaged producers; only whether the projects are located in communities that are considered distressed or disadvantaged. So, a white CAFO operator in a majority-Black community (as is a common situation in parts of the country, such as North Carolina) that wants to install a new methane digester and pipeline will receive a 15-point advantage under the guise of environmental justice. A Black farmer located in a community that does not meet USDA's definitions of distressed or disadvantaged and who wants to make energy efficient upgrades to their building will receive no points under that category. We recognize that the focus on “disadvantaged” and “distressed” communities instead of socially disadvantaged producers stems from a desire to avoid legal challenges, but the outcome is nonetheless problematic.

Last, USDA added additional points for “environmental benefits” in the Solicitation for Applications, as was requested by several biogas industry commenters in response to the Final Rule. While we support awarding points for environmental benefits in theory, USDA would need to conduct its own evaluation of the environmental implications of proposed projects and monitor those benefits instead of relying solely on the environmental benefits espoused by applicants. USDA does not outline a process for conducting an independent assessment of

environmental benefits, nor does it have a mechanism for monitoring environmental impacts of projects. For example, an applicant seeking to install a methane digester could receive a boost in this category on the basis of unverified claims for atmospheric methane reduction even if the applicant plans to increase animal herd sizes and use inferior manure management strategies in order to capture and sell more methane biogas. There would be no monitoring for increased respiratory disease-causing ammonia emissions, overapplication of nutrients to the soil from the digestate, or methane leaks – all of which can have devastating environmental justice implications. Unless USDA has robust plans to independently evaluate and monitor environmental benefits associated with proposed and funded projects, it should not include this criterion.

IV. USDA’s process for changing the scoring criteria and maximum award amount for REAP failed to account for stakeholder and community input, and the agency failed to conduct a NEPA analysis.

Beyond the content of the changes to the program, we take issue with USDA’s process and lack of consultation with environmental justice stakeholders. In April 2021, USDA published a Final Rule for REAP that included scoring criteria for applications. USDA then issued another Federal Register notice in February 2022 confirming that final rule and responding to comments received on the Final Rule, most of which were from the biogas industry. Yet, when USDA issued its Notice of Solicitation for Applications on March 31, 2023, the announcement included new scoring criteria and a new maximum grant amount that departed from those in the Final Rule and were not subject to public notice and comment.

For example, the scoring criteria established by the Final Rule included a maximum of 10 discretionary points for State Director and Administrator Priority Points, which included points for applicants that are a “member of an unserved or under-served population,” but this criterion was removed in the March 2023 Solicitation for Applications. Instead, USDA created 15 mandatory points for projects located in “disadvantaged” or “distressed” communities, regardless of the applicant’s identity, which was not included in the Final Rule.

The process, or lack thereof, by which USDA undertook these changes raises significant concerns. First, as you are aware, public participation is a central hallmark of our democracy. Notice and comment periods have become the principal method for the public to participate in the administrative process. To that end, the Administrative Procedure Act has formalized the public’s opportunity to weigh-in by mandating agencies to “give interested persons an opportunity to participate in the rulemaking through submission of written data, views, or arguments.”²¹ This mandate improves the quality of agency action and ensures that the administrative process has both public accountability and legitimacy. It is not only deeply disappointing, but potentially unlawful, that USDA has omitted this vital opportunity before making significant changes to this program through scoring criteria and grant amounts. Second, because the changes to REAP constitute a “major federal action that may significantly affect the environment,” USDA should have completed an Environmental Impact Statement under the National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.* (NEPA), *before* issuing

²¹ 5 U.S.C. § 553(c).

any changes.²² USDA has failed to undertake *any* NEPA analysis in this instance despite the likelihood of sweeping effects on impacted communities and the environment. USDA has not studied these impacts and must conduct a NEPA analysis before reevaluating the program's scoring criteria and approach to incorporating Justice40.

In conclusion, the undersigned organizations respectfully request that Rural Development develops new scoring criteria with input from impacted communities that better reflects the aims of Justice40 and other administration priorities, and conducts a new NEPA analysis before soliciting applications for the next application window. Thank you for your consideration and attention to this important matter.

1000 Grandmothers for Future Generations	Bee Friendly Williamstown
198 methods	Berkshire Environmental Action Team
350 Bay Area Action	Biofuelwatch
350 Central Mass	Boston Catholic Climate Movement
350 Seattle	Buffalo River Watershed Alliance
350 Triangle	Businesses for a Livable Climate
350Hawaii	Butte County Local Food Network
350ma-Berkshires	Call to Action Colorado
A Community Voice- Louisiana	Campaign for Family Farms and the Environment
Accelerate Neighborhood Climate Action	CatholicNetwork US
ADOS Mississippi/ ADOS Empowerment Project	Catskill Mountainkeeper
Alabama Interfaith Power & Light	Center for Biological Diversity
Alliance for the Wild Rockies	Center For Food Safety
American Friends Service Committee	Cherokee Concerned Citizens
American Sustainable Business Network	Church Women United in New York State
Animal Legal Defense Fund	Clean Air Action Network of Glens Falls
Animals Are Sentient Beings Inc	Clean Energy Action
Anthropocene Alliance	Clean Water for North Carolina
Athens County's Future Action Network (ACFAN)	Climate Action Now (Western Mass)

²² In its April 27, 2021 announcement publishing the final rule for REAP, USDA relied on a Categorical Exclusion as excusing further NEPA analysis, noting specifically that the action lacked extraordinary circumstances and would have no cumulative impacts. As detailed throughout this letter, there can be no argument or doubt that the March 31, 2023 changes to REAP significantly alter the impact that the program will have, thus triggering NEPA analysis despite any presence of a Categorical Exclusion. Notably, USDA's March 2023 announcement containing these changes makes no mention of NEPA.

Climate and Health Equity Fellow
Climate Hawks Vote
Climate Reality Massachusetts Southcoast
Climate Reality Project - Finger Lakes
Greater Region NY Chapter
CO Businesses for a Livable Climate
Community for Sustainable Energy
Compassion in World Farming USA
Cooperation Jackson
Dogwood Alliance
Don't Gas the Meadowlands Coalition
Elders Climate Action
Environmental Justice Community Action
Network
Extinction Rebellion Peace
Families for Clean Air
Farm Aid
Farm Sanctuary
Farmworker Association of Florida
Food Animal Concerns Trust
Food & Water Watch
Forests Forever
Friends of Miller Peninsula State Park
Friends of the Earth U.S.
GMO/Toxin Free USA
GMOScience
Good Neighbor Steering Committee of
Benicia
Government Accountability Project / Food
Integrity Campaign
Greater New Orleans Housing Alliance
Green America
Green Belt Movement International-North
America
Green State Solutions
GreenLatinos

HEAL Food Alliance
Honor the Earth
I-70 Citizens Advisory Group
Indivisible Ambassadors
Institute for Agriculture and Trade Policy
Iowa Citizens for Community Improvement
John Muir Project of Earth Island Institute
Kansas Black Farmers Association
La Semilla Food Center
Land Stewardship Project
Larimer Alliance for Health, Safety and
Environment
Last Tree Laws
Latino Farmers & Ranchers International,
Inc.
Leadership Counsel for Justice and
Accountability
LexCAN
Littleton Business Alliance
Locust Point Community Garden
Long Island Progressive Coalition
Mayfair Park Neighborhood Association
Board
Mental Health & Inclusion Ministries
Mercy For Animals
Mississippi Rising Coalition
Montbello Neighborhood Improvement
Association
Nicaragua Center for Community Action
No Fracked Gas in Mass
North American Climate, Conservation and
Environment (NACCE)
North American Water Office
North Carolina Association of Black
Lawyers Land Loss Prevention Project
North Carolina Conservation Network

North Carolina Environmental Justice Network
North Mississippi Leftist Coalition
Northeast Organic Dairy Producers Alliance
Nuclear Energy Information Service (NEIS)
Nuclear Information and Resource Service
Occupy Bergen County
Ohio Ecological Food and Farm Association
OrganicEye
Partnership for Policy Integrity
PATH
Pennsylvania Interfaith Power & Light
Physicians Against Red Meat (PhARM)
Progressives for Climate
RapidShift Network
Resist the Pipeline
Resource Renewal Institute
RESTORE: The North Woods
Rise Up WV
Rural Advancement Fund of the National Sharecroppers Fund
Rural Coalition
Save EPA (former employees)
Scientist Rebellion, Turtle Island
SEE (Social Eco Education)
Sisters of St. Dominic of Blauvelt, New York
Small Business Alliance
Socially Responsible Agriculture Project
Sound Resource Management Group, Inc.
Southern Forests Conservation Coalition

Southwest Organization for Sustainability
Spirit of the Sun, Inc.
Springfield Food Policy Council
Spruill Farm Conservation Project
Stand.earth
Standing Trees
System Change Not Climate Change
Terra Advocati
The Enviro Show
The Green House Connection Center
The Mind's Eye
The People's Justice Council
The Quantum Institute
The Wave Foundation
Third Act
Tupelo Mutual Aid Project
Turtle Island Restoration Network
Unitarian Universalist Society of Greater Boston
Unitarian Universalists for a Just Economic Community
Unite North Metro Denver
Upper Valley Affinity Group (Vermont)
Urban Tilth
Voters For Animal Rights
Wall of Women
Wendell State Forest Alliance
Western Slope Businesses for a Livable Climate
Womxn from the Mountain
Working for Racial Equity
World Animal Protection