

June 12, 2026

VIA ELECTRONIC AND CERTIFIED U.S. MAIL

Lee Zeldin, Administrator
Office of the Administrator
U.S. Environmental Protection Agency
Room 3000, WJC South Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460
Certified Mail # 9589 0710 5270 2165 9703 62

Aaron Szabo
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Certified Mail # 9589 0710 5270 2165 9703 55

RE: Notice of Intent to Sue to Compel Agency Action on Petitions for Reconsideration of the Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act

Dear Administrator Zeldin and Assistant Administrator Szabo:

The undersigned parties respectfully give notice under 42 U.S.C. § 7604 and 40 C.F.R. part 54 of their intent to sue Administrator Zeldin and the Environmental Protection Agency (EPA) to compel agency action on the Petitions for Reconsideration (Petitions) submitted to EPA on April 1, 2026 (State and Local Government Petition, attached as Exhibit A); April 14, 2026 (Zero Emission Transportation Association Petition, attached as Exhibit B); April 15, 2026 (American Public Health Association, et al. Petition, attached as Exhibit C); and April 16, 2026 (Service Employees International Union Petition, attached as Exhibit D). The Petitions request that the agency “convene a proceeding for reconsideration of the rule,” 42 U.S.C. § 7607(d)(7)(B), entitled *Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act*, 91 Fed. Reg. 7686 (Feb. 18, 2026) (Rescission). Petitioners expect EPA to act on the Petitions promptly, for the reasons set forth below. Nevertheless, as to each of the respective Petitions, if EPA continues its failure to act, each undersigned Petitioner intends to sue Administrator Zeldin and EPA in the U.S. District Court for the District of Columbia for EPA’s unreasonable delay in acting on that Petition after the notice period in 42 U.S.C. § 7604(a) has passed.

EPA must act on the Petitions. The Clean Air Act mandates that “the Administrator shall convene a proceeding for reconsideration of the rule” at issue if certain prerequisites are met. 42 U.S.C. § 7607(d)(7)(B). The Petitions explain why those prerequisites are met, but even if EPA disagrees, the agency has a duty to conclude the matter presented to it within a reasonable time. 5

U.S.C. § 555(b). Indeed, to claim otherwise would undermine bedrock administrative law principles and allow EPA to circumvent notice-and-comment requirements. Here, Petitioners seek to hold EPA accountable for substituting a wholly new methodology in the Rescission without ever subjecting those data and assumptions to public comment. EPA cannot attempt to escape scrutiny and insulate its illegal action from court review by simply refusing to resolve the Petitions.

It is Petitioners' expectation that EPA will act on the Petitions promptly, consistent with the D.C. Circuit's April 22, 2026, order in *American Public Health Association v. EPA*, D.C. Cir. No. 26-1037 (and consolidated cases), ECF # 2169939. In that proceeding, Petitioners requested that the Court defer a call for merits briefing proposals to give EPA time to respond to the Petitions, and the Court granted a deferral. *Id.* Accordingly, Petitioners anticipate EPA action on the Petitions will be promptly forthcoming and reserve their rights to pursue further relief in the D.C. Circuit if it is not.¹

EPA's delay in acting on the Petitions is patently unreasonable. The Petitions raise a straightforward, discrete, and glaring defect introduced in the final Rescission: EPA's reliance on new methodologies, data, and assumptions to support the Rescission's "futility" argument and other justifications, which were never made available for public comment. In the proposed rule, EPA relied on a draft report written in secret in less than two months by five handpicked climate skeptics—the Department of Energy's "Climate Working Group"—to argue that regulating U.S. motor vehicle emissions had no meaningful impact on climate change. But after a court deemed the Climate Working Group unlawful, EPA decided to introduce newly generated results of four models for estimating emissions inventories and changes in global temperatures and sea level rise caused by those emissions. EPA ran those four models using inputs and assumptions newly chosen by the agency and never exposed to public scrutiny. 91 Fed. Reg. at 7729. EPA relied on "the results of [this] modeling" for its determination of futility, which the agency then leveraged in support of the Rescission in EPA's statutory authority, major questions, and reasonableness rationales. *Id.* at 7692, 7711. By introducing and relying upon that new methodology for the first time in the final rule, EPA deprived Petitioners and the public of the opportunity to comment on the evidence cited by EPA in support of multiple, purportedly independent justifications for the Rescission. Accordingly, the Petitions each make a single, well-defined request to take notice and comment.

Rather than promptly acting on those requests, however, EPA has simply declined to act at all. Deciding those requests does not require months of study and deliberation. Instead, EPA need only decide whether the late substitution of new data and methodology undergirding all of the Rescission is a matter of central relevance to the outcome of the rule. 42 U.S.C. § 7607(d)(7)(B). That simple yes-or-no decision must be made upon reasoned consideration, which requires *some* time—but certainly not more time than EPA needs to decide whether to

¹ Petitioners separately reserve the right to argue in *American Public Health Association v. EPA*, D.C. Cir. No. 26-1037 (and consolidated cases), that EPA "unreasonably delay[ed] the completion of reconsideration" or a decision on the Petition and unlawfully failed to conduct notice and comment on the issues raised therein. *Mexichem Specialty Resins v. EPA*, 787 F.3d 544, 553 (D.C. Cir. 2015).

appeal a district court decision, Fed. R. App. P. 4(a)(1)(B), or file a brief in opposition to a motion, Fed. R. App. P. 27(a)(3)(A). The sixty days EPA has had since April 1 is by any rule of reason more than sufficient.

The Administrator has said that the Rescission is the most significant action EPA has ever taken. If EPA believes the Petitions do present an issue of central relevance to that action, it is untenable for EPA to maintain that it has higher priorities than responding to these Petitions. And if EPA believes the Petitions do not present such an issue, there is no reason why EPA cannot promptly say so, to clear the way for judicial review of all issues related to this rule—review that, according to EPA itself, should proceed apace in the D.C. Circuit. ECF # 2165141, at 2, 5, *Am. Public Health Ass’n v. EPA*, No. 26-1037 (D.C. Cir. Mar. 23, 2026).

Dated: June 12, 2026

Respectfully submitted,

(attachments)

**COMMONWEALTH OF
MASSACHUSETTS**
ANDREA JOY CAMPBELL
ATTORNEY GENERAL

STATE OF CALIFORNIA
ROB BONTA
ATTORNEY GENERAL

/s/ Hannah Perls
TURNER H. SMITH
Deputy Bureau Chief
HANNAH PERLS
Special Assistant Attorney General
Energy and Environment Bureau
Office of the Massachusetts Attorney
General
One Ashburton Place, 18th Fl.
Boston, MA 02108
(617) 963-2782
Turner.Smith@mass.gov
Hannah.Perls@mass.gov

/s/ Theodore McCombs
DAVID ZAFT
Supervising Deputy Attorney General
MADISON LANE
THEODORE MCCOMBS
CAITLAN MCLOON
Deputy Attorneys General
600 W. Broadway, Ste. 1800
San Diego, CA 92101
Telephone: (619) 738-9000
David.Zaft@doj.ca.gov
Madison.Lane@doj.ca.gov
Theodore.McCombs@doj.ca.gov
Caitlan.McLoon@doj.ca.gov

STATE OF NEW YORK
LETITIA JAMES
ATTORNEY GENERAL

/s/ Morgan A. Costello
MORGAN A. COSTELLO
Deputy Bureau Chief
YUEH-RU CHU
RACHEL MAMAN KISH
Chiefs, Affirmative Litigation Section
ASHLEY M. GREGOR
NATHAN B. SHULOCK
Assistant Attorneys General
Environmental Protection Bureau
NYS Office of the Attorney General
The Capitol
Albany, NY 12224
(518) 776-2392
Morgan.Costello@ag.ny.gov
Yueh-ru.Chu@ag.ny.gov
Rachel.Kish@ag.ny.gov
Ashley.Gregor@ag.ny.gov
Nathan.Shulock@ag.ny.gov

STATE OF CONNECTICUT
WILLIAM TONG
ATTORNEY GENERAL

/s/ Matthew I. Levine
MATTHEW I. LEVINE
Deputy Associate Attorney General
SCOTT N. KOSCHWITZ
WILLIAM E. DORNBOS
Assistant Attorneys General
JESSICA GIBREE
Special Assistant Attorney General
Office of the Attorney General
165 Capitol Avenue
Hartford, CT 06106
(860) 808-5250
Matthew.Levine@ct.gov
Scott.Koschwitz@ct.gov
William.Dornbos@ct.gov
Jessica.Gibree@ct.gov

Additional counsel for State and Local Government Petitioners are listed below

/s/ Chloe H. Kolman

CHLOE H. KOLMAN
MEGAN M. HERZOG
SEAN H. DONAHUE
KERI R. DAVIDSON
Donahue, Goldberg, Herzog & Davidson
1008 Pennsylvania Ave., SE
Washington, D.C. 20003
(202) 372-5270
Chloe@donahuegoldberg.com
Megan@donahuegoldberg.com
Sean@donahuegoldberg.com
Keri@donahuegoldberg.com

VICKIE L. PATTON
PETER ZALZAL
ALICE HENDERSON
STEPHANIE JONES
RYLAND SHENGZHI LI
Environmental Defense Fund
2060 Broadway St., Ste. 300
Boulder, Colorado 80302
(303) 447-7214
VPatton@edf.org
PZalzal@edf.org
AHenderson@edf.org
SJones@edf.org
RyLi@edf.org

*Counsel for Petitioner Environmental
Defense Fund*

/s/ Rachel Heron

RACHEL HERON
JOSEPH BRAU
DAVID DONIGER
JULIA FORGIE
MEREDITH HANKINS
ATID KIMELMAN
GAVIN McCABE
GLENDA VALDEZ
ABIRAMI VIJAYAN
Natural Resources Defense Council
1152 15th Street NW, Ste. 300
Washington, D.C. 20005
(202) 836-9329
RHeron@nrdc.org
JBrau@nrdc.org
DDoniger@nrdc.org
JForgie@nrdc.org
MHankins@nrdc.org
AKimelman@nrdc.org
GMccabe@nrdc.org
GValdez@nrdc.org
AVijayan@nrdc.org

*Counsel for Petitioner Natural
Resources Defense Council*

Additional counsel for Petitioners in Case No. 26-1037 are listed below

/s/ Tsuki Hoshijima

TSUKI HOSHIJIMA
ELENA S. GOLDSTEIN
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 448-9090
THoshijima@democracyforward.org

*Counsel for Petitioner Service Employees
International Union*

/s/ Meghan E. Greenfield

MEGHAN E. GREENFIELD
ELIZABETH B. DEUTSCH
ELIZABETH H. STARR
MAURA E. SMYLES
Jenner & Block LLP
1099 New York Ave., NW, Ste. 900
Washington, DC 20001
(202) 639-6000
Mgreenfield@jenner.com
EDeutsch@jenner.com
ESTarr@jenner.com
MSmyles@jenner.com

*Counsel for Petitioner Zero Emission
Transportation Association*

/s/ Bruce Morrison

BRUCE MORRISON
Great Rivers Environmental Law Center
4625 Lindell Blvd, Suites 200 & 300
St. Louis, MO 63108
(314) 231-4181
BaMorrison@greatriverslaw.org

*Counsel for Missouri Coalition for the
Environment and Metropolitan Congregations
United for St. Louis*

STATE OF ARIZONA
KRISTIN K. MAYES
ATTORNEY GENERAL

/s/ Kirsten Engel

KIRSTEN ENGEL
Special Attorney General
MARY M. CURTIN
Senior Litigation Counsel
Arizona Attorney General's Office
2005 N. Central Avenue
Phoenix, AZ 85004
(602) 542-3333
Kirsten.Engel@azag.gov
Mary.Curtin@azag.gov

STATE OF DELAWARE
KATHLEEN JENNINGS
ATTORNEY GENERAL

/s/ Vanessa L. Kassab

IAN LISTON
Director of Impact Litigation
RALPH K. DURSTEIN III
VANESSA L. KASSAB
Deputy Attorneys General
ROBIN JACOBS
Assistant Attorney General
Department of Justice
State Office Building
820 North French Street
Wilmington, DE 19801
(302) 683-8899
Vanessa.Kassab@delaware.gov

STATE OF COLORADO
PHILIP J. WEISER
ATTORNEY GENERAL

/s/ Carrie Noteboom

CARRIE NOTEBOOM
Assistant Deputy Attorney General
Colorado Department of Law
1300 Broadway, 10th Fl.
Denver, CO 80203
(720) 508-6285
Carrie.Noteboom@coag.gov

STATE OF HAWAII
ANNE E. LOPEZ
ATTORNEY GENERAL

/s/ Lyle T. Leonard

LYLE T. LEONARD
Deputy Attorney General
Department of the Attorney General
465 S. King Street, #200
Honolulu, HI 96813
(808) 587-3052
Lyle.T.Leonard@hawaii.gov

STATE OF ILLINOIS
KWAME RAOUL
ATTORNEY GENERAL

/s/ Jason E. James
JASON E. JAMES
Assistant Attorney General
MATTHEW J. DUNN
Chief
Environmental Enforcement/
Asbestos Litigation Division
JOANNA BRINKMAN
Complex Litigation Counsel
Illinois Attorney General's Office
201 W. Pointe Drive, Ste. 7
Belleville, IL 62226
(217) 843-0322
Jason.James@ilag.gov
Matthew.Dunn@ilag.gov
Joanna.Brinkman@ilag.gov

STATE OF MARYLAND
ANTHONY G. BROWN
ATTORNEY GENERAL

/s/ Steven J. Goldstein
STEVEN J. GOLDSTEIN
Assistant Attorney General
Office of the Attorney General of
Maryland
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
410-576-6414
sgoldstein@oag.maryland.gov

STATE OF MAINE
AARON M. FREY
ATTORNEY GENERAL

/s/ Emma Akrawi
EMMA AKRAWI
Assistant Attorney General
Natural Resources Division
Office of the Maine Attorney General
6 State House Station
Augusta, ME 04333
(207) 626-8800
Emma.Akrawi@maine.gov

STATE OF MICHIGAN
DANA NESSEL
ATTORNEY GENERAL

/s/ Hadley E. Tuthill
HADLEY E. TUTHILL
NEIL GIOVANATTI
Assistant Attorneys General
Michigan Department of Attorney
General
525 W. Ottawa Street
Lansing, MI 48909
(517) 335-7664
TuthillH@michigan.gov
GiovanattiN@michigan.gov

STATE OF MINNESOTA
KEITH ELLISON
ATTORNEY GENERAL

/s/ Catherine Rios-Keating
PETER SURDO
CATHERINE RIOS-KEATING
RYAN PESCH
Special Assistant Attorneys General
Office of the Minnesota Attorney
General
445 Minnesota Street, Ste. 600
St. Paul, MN 55101
(651) 757-1244
peter.surdo@ag.state.mn.us
catherine.rios-keating@ag.state.mn.us
ryan.pesch@ag.state.mn.us

STATE OF NEW JERSEY
JENNIFER DAVENPORT
ATTORNEY GENERAL

/s/ Lisa J. Morelli
LISA J. MORELLI
Deputy Attorney General
New Jersey Division of Law
25 Market Street
Trenton, New Jersey 08625
(609) 376-2740
Lisa.Morelli@law.njoag.gov

STATE OF NEVADA
AARON D. FORD
ATTORNEY GENERAL

/s/ K. Brunetti Ireland
K. BRUNETTI IRELAND
Chief of Special Litigation
Office of the Nevada Attorney
General
1 State of Nevada Way, Ste. 100
Las Vegas, NV 89119
KIreland@ag.nv.gov

STATE OF NEW MEXICO
RAÚL TORREZ
ATTORNEY GENERAL

/s/ Esther Jamison
ESTHER JAMISON
WILLIAM GRANTHAM
SPENSER LOTZ
Assistant Attorneys General
New Mexico Department of Justice
408 Galisteo Street
Santa Fe, NM 87501
(505) 627-3474
EJamison@nmdoj.gov
WGrantham@nmdoj.gov
SLotz@nmdoj.gov

STATE OF NORTH CAROLINA
JEFF JACKSON
ATTORNEY GENERAL

/s/ Asher P. Spiller
ASHER P. SPILLER
Senior Deputy Attorney General
RACHEL POSEY
Special Deputy Attorney General
North Carolina Department of Justice
P.O. Box 629
Raleigh, NC 27602
(919) 716-6600
ASpiller@ncdoj.gov
RPosey@ncdoj.gov

**GOVERNOR OF THE
COMMONWEALTH OF
PENNSYLVANIA**
JOSH SHAPIRO

JENNIFER SELBER
GENERAL COUNSEL

/s/ Robert A. Reiley
ROBERT A. REILEY
Deputy Chief Counsel
The Pennsylvania Governor's Office of
General Counsel
Office of Chief Counsel, Department
of Environmental Protection
RCSOB, 400 Market Street, 9th Fl.
Harrisburg, PA 17105-8464
(717) 787-0478
RReiley@pa.gov

STATE OF OREGON
DAN RAYFIELD
ATTORNEY GENERAL

/s/ Paul Garrahan
PAUL GARRAHAN
Attorney-in-Charge, Natural
Resources Section
Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
(503) 947-4540
Paul.Garrahan@doj.oregon.gov

STATE OF RHODE ISLAND
PETER F. NERONHA
ATTORNEY GENERAL

/s/ Nicholas M. Vaz
NICHOLAS M. VAZ
Assistant Attorney General
Environment and Energy Unit Chief
Rhode Island Office of the Attorney
General
150 South Main Street
Providence, RI 02903
(401) 274-4400
nvaz@riag.ri.gov

STATE OF VERMONT
CHARITY R. CLARK
ATTORNEY GENERAL

/s/ Hannah Yindra
HANNAH YINDRA
SAM STRATTON
Assistant Attorneys General
Office of the Attorney General
109 State Street
Montpelier, VT 05609
(802) 828-3186
Hannah.Yindra@vermont.gov
Sam.Stratton@vermont.gov

STATE OF WASHINGTON
NICK BROWN
ATTORNEY GENERAL

/s/ Christopher H. Reitz
CHRISTOPHER H. REITZ
ALEXANDRIA K. DOOLITTLE
SARAH M. REYNEVELD
Assistant Attorneys General
Office of the Attorney General
P.O. Box 40117
Olympia, Washington 98504-0117
(360) 586-6770
Chris.Reitz@atg.wa.gov
Alex.Doolittle@atg.wa.gov
Sarah.Reyneveld@atg.wa.gov

COMMONWEALTH OF VIRGINIA
JAY JONES
ATTORNEY GENERAL

/s/ Tillman J. Breckenridge
TILLMAN J. BRECKENRIDGE
Solicitor General
202 N. 9th Street
Office of the Attorney General of
Virginia
Richmond, VA 23219
(804) 786-2071
SolicitorGeneral@oag.state.va.us

STATE OF WISCONSIN
JOSHUA L. KAUL
ATTORNEY GENERAL

/s/ Gabe Johnson-Karp
GABE JOHNSON-KARP
Assistant Attorney General
Wisconsin Department of Justice
17 West Main Street
Post Office Box 7857
Madison, WI 53707-7857
(608) 267-8904
Gabe.Johnson-Karp@wisdoj.gov

THE DISTRICT OF COLUMBIA
BRIAN L. SCHWALB
ATTORNEY GENERAL

/s/ Lauren Cullum

LAUREN CULLUM
Special Assistant Attorney General
Office of the Attorney General
for the District of Columbia
400 6th Street, N.W., 10th Floor
Washington, D.C. 20001
Lauren.Cullum@dc.gov

**CITY OF ALBUQUERQUE,
NEW MEXICO**
LAUREN KEEFE
CITY ATTORNEY

/s/ Devon P. King

DEVON P. KING
Deputy City Attorney
LAUREN KEEFE
City Attorney
One Civic Plaza NW
PO Box 2248
Albuquerque, NM 87103
(505) 768-4628
LKeefe@cabq.gov
DKing@cabq.gov

**BAY AREA AIR QUALITY
MANAGEMENT DISTRICT**
ALEXANDER G. CROCKETT
GENERAL COUNSEL

/s/ Jamie Jefferson

CARRIE SCHILLING
Senior Assistant Counsel
JAMIE JEFFERSON
Assistant Counsel
375 Beale Street, Ste. 600
San Francisco, CA 94105
JJefferson@baaqmd.gov
ACrockett@baaqmd.gov
CSchilling@baaqmd.gov

CITY OF BOSTON, MASSACHUSETTS
MICHAEL FIRESTONE
CORPORATION COUNSEL

/s/ Megan Corrigan

MEGAN CORRIGAN
Assistant Corporation Counsel
City of Boston Law Department
SAMUEL B. DINNING
Senior Assistant Corporation Counsel
One City Hall Plaza, Room 615
Boston, MA 02201
(617) 635-4034
Megan.Corrigan@boston.gov
Samuel.Dinning@boston.gov

CITY OF CHICAGO, ILLINOIS
MARY B. RICHARDSON-LOWRY
CORPORATION COUNSEL

/s/ Myriam Zreczny Kasper
MYRIAM ZRECZNY KASPER
Deputy Corporation Counsel
GABRIELLE SIGEL
Assistant Corporation Counsel
Supervisor
BRADLEY R. RYBA
Assistant Corporation Counsel
City of Chicago Department of Law
2 North LaSalle Street, Ste. 580
Chicago, IL 60602
(312) 744-3564
Myriam.Kasper@cityofchicago.org
Gabrielle.Sigel@cityofchicago.org
Bradley.Ryba@cityofchicago.org

CITY OF COLUMBUS, OHIO
ZACH KLEIN
CITY ATTORNEY

/s/ Richard N. Coglianese
RICHARD N. COGLIANESE
Assistant City Attorney
City of Columbus Department of Law
77 N. Front Street, 4th Fl.
Columbus, OH 43215
(614) 645-0818
RNCoglianese@columbus.gov

CITY OF CLEVELAND, OHIO
MARK GRIFFIN
DIRECTOR OF LAW

/s/ Shirley A. Tomasello
SHIRLEY A. TOMASELLO
Assistant Director of Law
City of Cleveland Department of Law
601 Lakeside Avenue, Room 106
Cleveland, OH 44114-1077
(216) 664-3776
MGriffin@clevelandohio.gov
STomasello@clevelandohio.gov

**CITY AND COUNTY OF DENVER,
COLORADO**
MIKO ANDO BROWN
CITY ATTORNEY

/s/ Kristin Brainerd
KRISTIN BRAINERD
Assistant City Attorney
Denver City Attorney's Office
201 W. Colfax Ave., Dept. 1207
Denver, CO 80202
(720) 913-3212
Kristin.Brainerd@denvergov.org

HARRIS COUNTY, TEXAS
JONATHAN G.C. FOMBONNE
COUNTY ATTORNEY

/s/ Sarah Utley

JONATHAN G.C. FOMBONNE
County Attorney
SARAH JANE UTLEY
Managing Counsel
Affirmative and Environmental
Divisions
Harris County Attorney's Office
1010 Lamar, 11th Fl.
Houston, TX 77002
(832) 596-9786
Sarah.Utley@harriscountytx.gov

**MARTIN LUTHER KING, JR.,
COUNTY, WASHINGTON**
LEESA MANION
PROSECUTING ATTORNEY

/s/ Christopher M. Sanders

CHRISTOPHER M. SANDERS
General Counsel & Chief Legal
Officer to King County Executive
Girmay Zahiray
ERIN KING-CLANCY
Senior Deputy Prosecuting Attorney
Office of King County Prosecuting
Attorney Leesa Manion
401 5th Avenue, Ste. 800
Seattle, WA 98104
(206) 477-9483
ChrSanders@kingcounty.gov
EClancy@kingcounty.gov

**CITY OF LOS ANGELES,
CALIFORNIA**
HYDEE FELDSTEIN SOTO
CITY ATTORNEY

/s/ Jessica B. Brown

JESSICA B. BROWN
Assistant City Attorney
201 N. Figueroa St., 13th Floor
Los Angeles, CA 90012
(213) 978-1864
Jessica.Brown@lacity.org

**CITY OF NEW YORK, NEW
YORK**
STEVEN BANKS
CORPORATION COUNSEL

/s/ Leia Seereeram

LEIA SEEREERAM
Assistant Corporation Counsel
ALICE BAKER
Senior Counsel
New York City Law Department
100 Church Street
New York, NY 10007
LSeereer@law.nyc.gov
AlBaker@law.nyc.gov

**CITY AND COUNTY OF SAN
FRANCISCO, CALIFORNIA**
DAVID CHIU
CITY ATTORNEY

/s/ Robb Kapla
ROBB KAPLA
SOPHIA L. CAI
Deputy City Attorneys
City Hall, Room 234
1 Dr. Conrad B. Goodlett Place
San Francisco, CA 94102
(415) 554-4647
Robb.Kapla@sfcityatty.org
Sophia.Cai@sfcityatty.org

**COUNTY OF SANTA CLARA,
CALIFORNIA**
TONY LOPRESTI
COUNTY COUNSEL

/s/ Cristina Stella
CRISTINA STELLA
Deputy County Counsel
KAVITA NARAYAN
Chief Assistant County Counsel
MEREDITH A. JOHNSON
Lead Deputy County Counsel
Office of the County Counsel
County of Santa Clara
70 West Hedding Street, East Wing,
9th Fl.
San José, CA 95110
(408) 299-5900
Cristina.Stella@cco.sccgov.org

JASON RYLANDER
DAVID PETTIT
LAUREN PARKER
Center for Biological Diversity
1411 K Street NW, Ste. 1300
Washington, D.C. 20005
(510) 844-7100 (Pettit)
dpettit@biologicaldiversity.org

*Counsel for Petitioner Center
for Biological Diversity*

JAMES CROWLEY
Conservation Law Foundation
235 Promenade Street
Ste. 560, Mailbox 28
Providence, RI 02908
(401) 228-1905
JCrowley@clf.org

*Counsel for Petitioner
Conservation Law Foundation*

VERONICA SALTZMAN
FRANCIS W. STURGES, JR.
SHAUN A. GOHO
Clean Air Task Force
114 State Street, 6th Fl.
Boston, MA 02109
(617) 624-0234
VSaltzman@catf.us

*Counsel for Petitioners American Public
Health Association, Alliance of Nurses for
Healthy Environments, American Lung
Association, and Clean Wisconsin*

HANA V. VIZCARRA
MARVIN C. BROWN IV
Earthjustice
1250 I Street NW, 4th Fl.
Washington, D.C. 20005
(202) 667-4500
HVizcarra@earthjustice.org
MCBrown@earthjustice.org

*Counsel for Petitioners Clean Air Council,
Physicians for Social Responsibility, and
Union of Concerned Scientists*

BRIAN H. LYNK

Environmental Law & Policy
Center
740 15th Street NW, Ste. 700
Washington, D.C. 20005
(240) 461-4241
BLynk@elpc.org

*Counsel for Petitioner
Environmental Law & Policy Center*

ADINA H. ROSENBAUM
ALLISON M. ZIEVE
Public Citizen Litigation Group
1600 20th Street NW
Washington, D.C. 20009
(202) 588-1000
ARosenbaum@citizen.org

Counsel for Petitioner Public Citizen

ANDRES RESTREPO
JOSHUA BERMAN
Sierra Club
50 F Street NW, Eighth Fl.
Washington, D.C. 20001
(856) 240-0964
Andres.Restrepo@sierraclub.org
Josh.Berman@sierraclub.org

VERA PARDEE
726 Euclid Avenue
Berkeley, CA 94708
(858) 717-1448
pardeelaw@gmail.com

Counsel for Petitioner Sierra Club