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VIA EMAIL & MAIL

June 7, 2018

Debra McGhee  
U.S. Environmental Protection Agency  
Office of General Counsel  
External Civil Rights Compliance Office (ECRCO)  
Mail Code 1201A  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[Title VI Complaints@epa.gov](mailto:Title_VI_Complaints@epa.gov)

Re: Supplement to Title VI Environmental Justice Complaint against  
NC Department of Environmental Quality

Dear Ms. McGhee:

We appreciated the opportunity to discuss our Complaint with you and other ECRCO staff earlier this week.

I am attaching the documents we discussed to this supplement to the Complaint. The studies further support our claims is the failure of the State agencies to properly assess the disproportionate impacts on communities of color:

1. Paranjape, O., et al., "High Consequence Areas, Blast zones and Public Safety Along the Atlantic Coast Pipeline," September 2017.  
<https://cwfnc.org/documents/Updated-Report-High-Consequence-Areas-Blast-Zones-Public-Safety-along-the-ACP-10-2-2017.pdf>
2. BREDL, "Buckingham County Compressor Station, Atlantic Coast Pipeline. Pollution Report: Unfair Illegal and Unjust," Technical Report No. 16-342,

December 2016. [http://www.bredl.org/pdf5/161207\\_air\\_pollution\\_report-FINAL.pdf](http://www.bredl.org/pdf5/161207_air_pollution_report-FINAL.pdf)

3. Hsuing, S., et al., "Estimating Economic Damage from Climate Change in the United States," <http://science.sciencemag.org/content/356/6345/1362> (used by Dr. Emanuel to determine disproportionate impacts).
4. Emanuel, R., et al. "Beyond Box Checking: Toward Sound Environmental Justice Analyses for Informed Decision-Making and Meaningful Tribal Consultation," poster for 2017 American Geophysical Union Fall Meeting.

In addition, here is the list and organization of those who joined us on the call:

1. John Runkle, [jrunkle@pricecreek.com](mailto:jrunkle@pricecreek.com), Counsel for Environmental Justice Groups
2. Kristen Wills, [kristen@ncwarn.com](mailto:kristen@ncwarn.com), Staff Counsel for NC WARN
3. Therese Vick, [therese.vick@gmail.com](mailto:therese.vick@gmail.com), Blue Ridge Environmental Defense League (BREDL), assists BREDL chapters on Atlantic Coast Pipeline (ACP)
4. Louis Zeller, [bredl@skybest.com](mailto:bredl@skybest.com), BREDL Executive Director
5. Cary Rodgers, [rodgersoc01@yahoo.com](mailto:rodgersoc01@yahoo.com), BREDL NC Environmental Justice Coordinator, assists BREDL chapters on ACP
6. Sharon Ponton, [ponton913@msn.com](mailto:ponton913@msn.com), BREDL, assist BRED chapters in Virginia on ACP
7. Charles Utley, [bredlutley@gmail.com](mailto:bredlutley@gmail.com), BREDL Associate Director and Environmental Justice Coordinator, Atlanta GA
8. Robie Goins, [robiegoins@yahoo.com](mailto:robiegoins@yahoo.com), EcoRobeson, Robeson County NC
9. Donna Chavis, [dfc54321@gmail.com](mailto:dfc54321@gmail.com), Friends of the Earth, EJ Coordinator on ACP, Robeson County NC
10. Dr. Ryan Emanuel, [ryan.e.emanuel@gmail.com](mailto:ryan.e.emanuel@gmail.com), Associate Professor, NC State University, technical support

Thank you for your consideration. In addition to mailing any decision you make regarding the complaint, I would appreciate your sending it also be email to facilitate my sending out to our groups.

FOR THE ENVIRONMENTAL JUSTICE GROUPS

Respectfully submitted,

*/s/ John D. Runkle*

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*/s/ Kristen L. Wills*

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