



Episode Title: Community Outreach and Environmental Justice -- A Conversation with Rachel James of the SELC

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Lynn L. Bergeson (LLB): Hello, and welcome to *All Things Chemical*, a podcast produced by Bergeson & Campbell, P.C. (B&C[®]), a Washington, D.C., law firm focusing on chemical law, business, and litigation matters. I'm Lynn Bergeson.

This week, I had the distinct pleasure of visiting with Rachel James, an attorney with the Southern Environmental Law Center (SELC). Rachel's background and specialized training make her uniquely well suited to address some of the very interesting issues in which SELC engages on behalf of a diverse set of community groups. The Biden-Harris administration has made environmental justice (EJ) and accounting for susceptible subpopulations core components of its approach to environmental justice, and environmental protection as a whole. My conversation with Rachel provides greater insights into how this is working in practice. Now, here is my conversation with Rachel James.

Rachel, thank you so much for joining me in the studio this morning. I'm just thrilled to have this conversation.

Rachel James (RJ): It's a pleasure to be here, Lynn. Thank you for inviting me.

LLB: You bet. Listen, I was delighted to make your acquaintance while you were here in Washington recently, where we were both attending the ABA [American Bar Association] Section of Environment, Energy, and Resources (SEER) fall annual meeting, something that I attend fairly regularly. For the benefit of our listeners, you are an Associate Attorney with the Southern Environmental Law Center working in its Charlottesville, Virginia, offices. I know, in addition to your law degree, you have a master's degree with honors in global leadership and sustainable development, and importantly for this conversation, have been awarded a certificate in Native Hawaiian law from the University of Hawaii's Richardson School of Law. I was hoping, in addition to that very, very brief background, you could share with me and our listeners how you came to grow up in southeastern Arizona and then live, work, and get a law degree in Hawaii, and now live and work in the Commonwealth of Virginia.

RJ: Wow, thank you for that introduction, Lynn. I must say, the short answer to that question is the military. I'll give you a little bit, but not too long a background on that. My parents met when they were both serving in the Army in Germany and then were stationed at a later point in a small town, a small town, but a small base, Fort Huachuca, in southeastern Arizona. My Dad liked living there. When they got out, they thought it was a good place to raise a family, so I was born and raised there. And then I married an Army person, whom I met there in Arizona, and we were stationed in Hawaii. That's what moved me to Hawaii.

Then my youngest daughter and I lived and stayed there for about 15 years, so she was raised there. The degree you mentioned in global leadership and sustainable development I earned while there at Hawaii Pacific University and then went on to get my law degree at WSRL, as we call it, the William S. Richardson School of Law. Then, because most of my family is here on the continent, or the lower 48, as some folks call it, that 15 years felt a bit long to be away from family. We had some upsets and losses and just a few things that happened that really made us realize how important it was to be closer, because across the ocean is quite a distance. Then I was fortunate to be welcomed to join the SELC team, so Virginia was the place to land, and this is where my husband retired. So here we are.

LLB: Having visited Hawaii a couple of times, I can well appreciate the sense of distance. I mean, when I've been there, not obviously nearly as long as you have, but the sense of geographic distance is pretty astonishing. I mean, you really feel kind of far away from the United States, and yet it *is* the United States. But that sense of distance is all the more acute, at least to me.

RJ: Yes, it's the most isolated land mass, so that little dot in the middle of the Pacific is quite a distance from anyplace else.

LLB: Yes, but it surely is beautiful, especially as we approach the winter months here in Washington. You were honored in 2021 by the *Hawaii Business Magazine's* "20 for the Next 20." Can you tell us a little bit about this award? I believe you then worked for the Hawaii Center for Advanced Transportation Technologies and later the Hawaii Public Utilities Commission (PUC), working on the integration of energy justice into energy planning processes, among other topics. Which employment led to the recognition? And tell us a little bit about why you were gifted that way.

RJ: Yes. The *Hawaii Business Magazine's* 20 for the next 20 -- it's an interesting award, because it is awarded to 20 people each year. And they are 20 people that the magazine has received nominations to select for the award. The nominations are actually anonymous, so I hadn't known that I was up for consideration. You don't know that you're up for consideration until you've been selected, or if perhaps the person who nominated you let you know later on and maybe is planning to submit again. But the award recognizes people who the magazine and the nominees believe will be leaders for the next 20 years for Hawaii, so often the award is reflective of a person's service, both through their employment as well as any other ways that they are supportive of community and leading, sort of generally, in what they do in and out of work.

The employment that led to it, I think, is the collection of the things that I've done. Knowing the people who nominated me, much of my engagement with them was actually through my board membership and volunteer experience, working with some of them in supporting grassroots organizations in Hawaii, as well as working with women's small businesses. I think the fact that I was able to actually be employed in state offices both with the Hawaii Center for Advanced Transportation Technologies and then later with the Hawaii PUC, I

think those contributed to the selection. But a number of the items that were spoken about were the volunteer efforts that I had undertaken in the past ten or so years being in Hawaii.

LLB: Congratulations on being honored that way. It's certainly well deserved.

RJ: Thank you. Thank you. It was a gift, really. I'm getting all emotional now because it was a really, really special time.

LLB: Oh, sure. Just to be recognized for your, I'm sure, invaluable contributions to all the community groups that you did serve and assist is just really, really nice.

RJ: It was.

LLB: Now that you're in the so-called lower 48 and working with SELC, maybe you could tell us a little bit more about the work SELC does. As its name suggests, it focuses on environmental issues arising in southern states, including Alabama, Georgia, North Carolina, South Carolina, Tennessee, and of course, Virginia. How is it that you came to land there, and what is it that SELC does that drew you to it?

RJ: Yes. I promise that this is not a LinkedIn ad, but in all sincerity, LinkedIn is how I learned about SELC.

LLB: No kidding!

RJ: I say it because when -- for those who have used LinkedIn and secured the job that they desired, LinkedIn has the option of like, "Do you want to let people know," you can click a button so that your profile shows that "I got a job through LinkedIn!" While this is not a LinkedIn ad, the truth of the matter is I put in some information, the algorithms did their work and surfaced a number of positions at SELC. The interesting thing was the same time that I was looking for a job because I knew I was going to be moving back to the States -- or to the continental United States -- I was working on a project at the Hawaii PUC, and the project that I was working on, a friend of mine had sent me a news article that was done about that work, and then the news article had a link to another program that was similar to that program. And I clicked on that link and I read the article, and the article was about a program that an attorney from SELC, David Neal, was forwarding. And I was like, "Oh, that's so interesting. I just learned about this SELC organization in LinkedIn," and I was like, and they're doing similar work to what I'm working on.

LLB: Wow, what a coincidence!

RJ: Then I had signed up for a webinar, maybe with ELI [Environmental Law Institute] on Environmental Justice, and one of the speakers, Chandra Taylor-Sawyer, also an SELC attorney, was one of the panelists for that. Later on that week, I joined the webinar, and I hadn't paid keen attention to who would be on the panel. But as the panelists were introduced, I was like, "Another SELC person!"

LLB: It was your destiny.

RJ: It certainly feels like it. In all candor, when I went to law school and did my little dream board, my dream job was actually to be what I called an E squared attorney, which was an environmental and energy attorney.

LLB: Rachel, tell me a little bit more about the E square. That is an interesting term that I haven't heard before. Of course, I work with environmental resource and energy attorneys in a wide variety of contexts. To me, many of these issues are becoming more focused and integrated, certainly more than they have in the past. What's your take on that?

RJ: I couldn't agree more, and I'm certainly not going to say that I was clairvoyant back in my law school days.

LLB: No, do say that.

RJ: No, but I think having worked as a project manager in renewable energy and having gotten a degree in sustainable leadership -- global leadership in sustainable development, rather -- the ideas of system thinking and things being integrated were ideas that came with me into law school, and I didn't really understand the separation of law and how different areas of law were very separate practices. I think when I met practicing attorneys, when I said, "Oh, I want to be an environmental and energy attorney, like an E squared attorney," they were just like, "You got to pick one," and I was like, "But why?"

I think there were certainly valid reasons for why they came to me with skepticism, but it was all the more reason why SELC was attractive to me, because I thought, "Wow! There's people here who organizationally have a shared mindset that these are integrated practice areas." So I was really excited to find my dream job at SELC.

LLB: We're certainly glad that you did, and I believe you *were* clairvoyant because given the practice of law generally in our space, environment, energy, and resources, they're definitely coalescing around core issues, many of which involve broad and diverse stakeholder communities working with many of the issues that I know are central to your work, including energy, environment, environmental justice, and how do you sort all of those issues out within the legal context that we have here in the United States?

Let me shift over to your specialized expertise in working with Native Hawaiians. You have your degree, your experiences when living and working in Hawaii. Can you tell us a little bit more about the Native Hawaiian law, and what kinds of skills do you believe are needed to advocate on behalf of Tribal nations generally?

RJ: Sure. Hawaii has a history that has unique elements, but unfortunately, a shared history with many places that have been colonized, and so Hawaii existed as a kingdom well before contact, and before annexation, and before becoming a state. And so Native Hawaiians are people from those pre-contact time periods who continue to live on the land. And there's certainly a diaspora of Native Hawaiians who are living in places outside of Hawai'i. But the Native Hawaiian Law Certificate is a certificate that reflects the holder's pursuit of issues that are focused on Native Hawaiians: understanding issues around sovereignty, understanding traditional and customary practices, and understanding the laws that support -- and in some cases hinder -- Native Hawaiians being able to exist as full sovereign entities in their home place.

That looks a variety of different ways. Many times, that comes up in relation to water rights, in terms of usage and management, as well as preservation and protection of, as I mentioned, traditional and customary rights. That could be gathering practices, that could be worshiping in certain places. It can look a variety of ways, but really, the core component is individuals from that community being able to exercise full sovereignty and having ownership over their places and decisions for how they live, work, and worship in those

places. I think that is a core element that is similar across Indigenous communities and Native peoples, is that core element of sovereignty, and that is challenged by colonization. I think that similarity is something that can carry on from my work with Native Hawaiians in investigating what work can look like here with Tribes and Native peoples in the continental United States.

I think in another sort of generalized sense, one that underlying understanding of people in their sovereignty, and then really understanding the history of those people I think is important. One of the things I think that can be problematic is Native peoples can often be grouped as sort of like one as a monolith, and that, like dealing with one Native group, can carry on the same practices as dealing with another Native group of peoples. In particular, in the context of law, I think there are really important historical differences to realize because that impacts present-day experience. For instance, working with Native Hawaiians, Native Hawaiians aren't federally recognized in the way that some Tribal communities in the continental United States are recognized. Virginia has, I believe, seven federally recognized Tribes, but there are 11 state-recognized Tribes. Native Hawaiians wouldn't fit either of those categories because there is not a state recognition or federal recognition process that Native Hawaiians have participated in. I think even just from a -- in thinking of skills, I think there's a deep listening skill that's necessary to work with Native peoples, specifically when dealing in situations that have some legal implication.

LLB: I can assure you that my understanding of Indigenous communities, Tribal nations generally, is appallingly bad. One of the reasons I was so thrilled that you were coming on to the podcast is just to share some of these thoughts with our listeners. This is not an area of the law that I practice in, nor when I went to law school, was even offered as an area to study, which speaks volumes. But I can also appreciate, given just knowing you a little bit and hearing your remarks at the ABA, and listening to you now, that working with Indigenous groups, community groups, just a diversity of stakeholders in any regional area, whether it's Hawaii or Virginia, is something that you excel at and seek out in in your work as a practicing lawyer.

Maybe you can tell us a little bit about how SELC organizationally goes about identifying legal issues to pursue and partnering with community groups and identifying how those issues could be brought forward in a way that aligns with SELC's mission, and also your personal commitment to being the lawyer that you are and being as committed as you are to working with community groups on energy and environmental issues.

RJ: Thank you for that. This is going to be a full-on SELC plug, I must say.

LLB: It does fabulous work, Rachel. I know that.

RJ: I really appreciate the opportunity to share. I think in terms of how SELC partners, it's one of the things that drew me to the organization. I really appreciate the organization's deep commitment to really understanding the communities wherein they are forwarding work, and that looks a variety of different ways. One, that's an internal organizational look at like who is the organization composed of, and to the extent that the organization can, are the people who are doing the work reflective of the communities that we're serving? As an employee of SELC, I'm really honored to work for an organization that has that sort of internal commitment.

Then in terms of outward-facing work, how we actually find the partnerships and find the work, I think that comes in a lot of different ways. It's a 30-plus-year-old organization, so

there's certainly a track record and a history there that -- and I don't say this in a braggart way -- but people know the organization and will call to bring up issues that they have seen in their community or heard about in a neighboring community or a friend told them about, so some of that work just comes directly to us because people call in and say, "Hey, I heard of a thing that you guys might be interested in."

I think other ways work comes to us is a number of folks in SELC are active community members in a variety of things, so whether that's working, serving on a board for, I don't know, a nature restoration organization or on a board that's supporting advancement of clean energy, conversations come through those avenues just by virtue of people at SELC participating in their communities.

But then we also have long-standing partnerships with organizations. One of the ones that comes to mind immediately -- because as I came to SELC and was thinking about environmental justice work, I was curious about some of our partners and thinking about partnerships with Virginia Interfaith Power & Light (VAIPL). I remember actually meeting them -- folks from that organization -- on a hike with the Virginia Conservation Network. The Virginia Conservation Network had brought together so many environmental organizations. Amongst those organizations was an entity that was focusing on energy. So again, it was one of those moments of, "Wow! This is really awesome that we are environmentalists who understand the role that energy planning has in protecting our air, water, and climate." But those are commitments that SELC has. Our commitment is to protect our air, water, climate, wildlife, lands, and the people that live there. I think our partnerships and the way that we work comes through being involved in our communities, and those community involvements -- in my head, I'm seeing a succession of hands extending further and further into communities, but really, I think the reach is just a few sets of separation between people.

LLB: It's just kind of wonderful how there's a coalescing of all of these interests that you set out to pursue when you started your legal career. Maybe I should know this, but is there a Northern Environmental Law Center? There's SELC; are there are other regional SELC organizations scattered throughout the United States?

RJ: That's an excellent question. We are focused strictly in the Southeast. We believe that solutions start in the South. My Dad's actually from the south. He's from Louisiana, and while Louisiana is not a state in which SELC has an office, I still feel that southern roots are deep. Organizationally, we are focused on solutions for the South, and we focus there because we believe that the solutions actually do start here for the nation and the world.

LLB: Speaking of environmental justice, the Current Administration has really made an extraordinary push to identify EJ as a priority, help define specific legal tools and better ways of defining what EJ is. It is a real cornerstone, I think, of the Biden-Harris Administration's commitment to environmental and energy excellence. Maybe you can give us a couple of examples of how EJ issues have been a part of the SELC agenda.

I practice in chemical law, so the distribution of chemical exposures, particularly to marginalized communities and fence-line communities, is a very, very important part of my practice. I know, my sense, Rachel, is that you don't do a lot of TSCA [Toxic Substances Control Act] and FIFRA [Federal Insecticide, Fungicide, and Rodenticide Act] work, but certainly the EJ component and the Biden-Harris commitment to identifying environmental justice and helping to achieve it as best we can, or at least improve the situation, is a super important part of virtually all environmental and energy policies. How is SELC addressing

that, and are there specific projects in which you are now engaged or have been engaged that would help our listeners understand better what the environmental justice equation is all about?

RJ: Sure. One of the things I like to, I guess, ground a conversation in environmental justice in is just that environmental justice as a goal -- I think in moving toward that goal, it's important to recognize that there is environmental *in*justice. I say that because I think it can be hard to look back sometimes, and it can be disheartening to look back, but I think it's important as an underlying truth to realize that extensive harm has been done to particular communities in relation to their experience of the environment, and often that harm has been -- it can be health-related. You can also think of harms in terms of people who suffer more because they're already worse off. I think sometimes -- one of the things that struck me in first speaking about environmental justice, when someone was having a discussion about a group of people who lived next to a polluting resource, they were just really confused with why the people who lived there didn't just move. That was sort of their starting place was like, "Okay, I hear you. Environmental injustice, great. But also, why don't they just move?"

I think that question came from a sense of annoyance, but it provided an opportunity to talk about really, why *don't* they just move? I think that's part of the equation of the injustice. Thinking about do people have the mobility? Do they have the resources and means to just up and move? But even thinking about those who do, maybe they don't *want* to move. Maybe that's their ancestral homeland. Maybe that's the place that their family has lived for generations. Maybe that's the only place where they have generational wealth because perhaps they own the land. I'm sharing all this and being a little long-winded in terms of environmental justice, because SELC does take that approach of really understanding the people, where they are in place, as well as the environmental impacts that they've endured, and seeing how those can be remedied going forward, and then really investigating how new plans don't perpetuate existing injustices.

So one is certainly ameliorating the injustice that exists, but then trying really hard to make sure that those bad practices aren't continued. As a specific example, we can talk about planning from an energy perspective. Virginia, the state in which I work, has both a Virginia Environmental Justice Act as well as a Virginia Clean Economy Act. I mention those two because the Virginia Clean Economy Act sets a pathway for the state to achieve 100 percent, a 100 percent renewable portfolio standard, and move to a net-zero carbon economy. The Virginia Environmental Justice Act sets out a policy for the Commonwealth to focus on achieving environmental justice and to focus specifically on environmental justice in frontline communities.

When you put those two things together, that lands pretty squarely in the lap of the electric utility provider. Part of my work, at least before the State Corporation Commission, has been advocating for the utilities that are providing services across the Commonwealth to, one, achieve those clean energy goals that the Virginia Clean Economy Act has set out, but then to also do that with a keen focus on environmental justice. That means looking at where are the resources being placed: in thinking about the Biden-Harris Administration and their focus on environmental justice, thinking about what resources can the utility -- and perhaps the contractors it's working with -- what resources can they bring to a project to maximize the benefits for all ratepayers, but also to allow siting cleaner technology in communities that have previously borne polluting technologies? We're really pushing decision-makers to think holistically about how they're planning for the future and then also

looking to clean up what we can as we move forward. I hope those are informative examples.

LLB: Those are excellent examples. One question that I have is I know the Biden-Harris Administration has done a good job of providing a lot of tools to assist in better defining what environmental justice is and how do you identify environmental injustice in more quantitative ways? In your experience, have you found the federal tool making kit that has been really growing over the past four years augmenting your ability to deploy the local resources that you just addressed, the Environmental Justice Act and the Clean Energy Act that is unique to Virginia. Do they work as complementary skill sets and tools, or are they more siloed than that, like you really focus on just the Virginia Environmental Justice Act, and the federal tools and federal policies that are coming down really don't apply all that well?

RJ: I think that's an excellent question because we are in the midst of testing that now. There is a suite of tools, as you mentioned. I will focus on EJScreen for the purposes of just environmental justice and EPA's tool to help tease out some of the specific issues related to environmental injustices. The EJScreen tool is helpful in surfacing information for community block groups, which is the smallest tracking group that the [national] Census does. That is helpful in a few ways. It's a great conversation starter, I should say it that way.

I feel like the EPA actually sets that tool out in this manner. They certainly advocate for the use of the tool, but advocate for it to be a first-step tool, as in, here are some things that you might want to think about, given a particular community, at the smallest measurement we can provide. Where I think we're testing that now in the context, at least here in Virginia, where Virginia's Clean Economy Act has language about focusing on disadvantaged communities. And Virginia also has the Virginia Environmental Justice Act. The definitions aren't one for one the same as the definitions that are used by the federal government. I think it forces us to have a conversation, which I think is sort of the purpose of these tools is to like, "Here are some things that we should consider. Now let's talk about it."

I think we're still sort of testing what does that mean when we start to talk about it? Because we've had different responses -- and I'm not going to call anybody out and point out bad actors -- but I will say that some entities that are making decisions about how to engage with environmental justice communities, or even identifying what communities *are* environmental justice communities, there is not a consensus on what tools should be used to make that identification. In the context of Virginia, where we have laws that describe how these communities are identified, the tendency is to lean toward the laws as described by the Commonwealth.

LLB: And so much of this is trying to invite much more communication between and among community groups, federal, and state entities. It sounds like the federal tools can be a helpful conversation starter, but because there are fundamental differences between how EJ is defined at the federal level versus the state level, the process is necessarily iterative. If it gets people together, and gets people starting to talk about important issues that heretofore have not been addressed in any meaningful legal way, so much the better.

RJ: I couldn't have said it better.

LLB: Have your law experiences in Hawaii, are they -- just kind of curious -- fundamentally similar or dissimilar from your more recent experiences working in the Commonwealth of Virginia with SELC? Just struggling with how your skill set, Rachel, in working with

community groups and really addressing some of these very important issues of how can our legal system be better utilized to ensure equity among diverse stakeholders that are very differently placed in society? I can imagine there being a lot of overlap, but a lot of unique attributes to the Hawaiian situation versus the Virginia situation. But I'm just speculating. What can you tell us?

RJ: There are certainly differences. They were quite stark. I moved to Virginia understanding that things would not be the way they were in Hawaii, just because living there, we know that things on the outside are different. Just speaking from a utilities commission perspective, in Hawaii, I was working for PUC, and I worked when there was a Chair who had very strong ideas and was relentless in pushing the utility to move faster, cheaper, more equitably toward clean energy. Hawaii was the first state to have a 100 percent clean energy goal. I moved from a state with a foundational starting place that was quite different than moving to Virginia. And while Virginia does, as of 2020, have a 100 percent renewable portfolio standard goal, Virginia, being a more purple state, makes that goal a more questionable thing than what I experienced in Hawaii. I don't mean to say that it's simply politics that makes that goal a sort of ongoing question. But in Hawaii, we had a 100 percent goal. Everyone was on board. The argument with the utility wasn't like, "Are we going to move to 100 percent clean energy?" It was just, "How do we get there?"

LLB: How best to do it.

RJ: Moving to Virginia, the conversations around moving to 100 percent clean energy I feel like are more of a question of, "Do we actually want to do that? Can we do that and still grow our economy?" It feels like perhaps an earlier stage of convincing that I've entered here in Virginia that I hadn't fully expected, and so in terms of how the work gets done, I feel like there's a lot more convincing, where I feel like I had the benefit of everyone being like, "Yes, this is where we're going. How do we get there?" positioning. While we had tense conversations, and disagreements about things, and called in a variety of experts, and had many, many technical conferences to figure out the best way, having that underlying "We're going in the same direction" has been a stark difference.

And then Hawaii, probably the year I left, I left in 2022, so I want to say toward the end of that year, the commission opened a proceeding to focus specifically on energy equity and to understand what that means for the state and what that looks like as we move toward clean energy. And there's no such similar docket at the commission here in Virginia. I think Virginia's State Corporation Commission is starting to grapple with environmental justice and to understand what responsibilities it, as an institution, has, but then also the utilities that come before it, what responsibilities they have to achieve environmental justice in the context of energy planning. But that's something they're still grappling with here in Virginia.

LLB: The good news is those questions are beginning to arise and get sorted. It sounds to my ear, Rachel, that your listening skills, your keen listening skills, your ability to liaise with a broad diversity of groups and coordinate and communicate with community groups of all sorts will be put to very good use at SELC in Virginia.

RJ: Thank you.

LLB: Maybe as a concluding question, you can let our listeners know how they might find out more about SELC's work and learn more about all of the interesting and important work that you are engaged in in Charlottesville and organizationally, how some of these issues --

many of our listeners, for example, I think, live in Virginia, so these issues are not abstractions. They're real and important, and they may wish to contribute in some meaningful way to SELC's work.

RJ: Thank you for the opportunity to share. I think a great way to learn about what SELC is doing is to visit our website, which is southernenvironment.org. There's a wealth of information there, but even if you don't feel like reading through all of the things on the website, you can sign up for our newsletter. You can subscribe for updates from that website. You can also see the links to follow us on Facebook, Instagram, YouTube, and Twitter -- or X, formerly known as Twitter. I have to get used to saying that correctly.

LLB: I know, as we all do.

RJ: And one of the things I think -- it's a really wonderful way to learn about SELC, but to also learn about the communities that we're supporting, is through the *Broken Ground* podcast. That's available pretty much wherever you find your podcasts, so Apple and Spotify for sure, but also visiting the website, you can find information for how to listen to the podcast, and there you'll learn about my various esteemed colleagues, but really get a chance to get to know the communities that we've been able to serve over the years.

LLB: I know I *did* subscribe to the newsletter, and now I am going to listen to *Broken Ground* podcast, because I hadn't yet had an opportunity. Thank you for bringing all that information to us, Rachel, and thank you for being here today and telling us more about your work, your history, and all the important issues that you're engaged in on behalf of SELC and stakeholder groups in the Commonwealth of Virginia. Thank you so much, Rachel.

RJ: Thank *you* so much, Lynn. It's been a pleasure spending this time with you. I'm grateful.

LLB: My thanks to Rachel for speaking with me today about her work with the Southern Environmental Law Center and how she puts her specialized skills in working with and for a broad range of community groups to really good use.

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