



GREAT RIVERS ENVIRONMENTAL LAW CENTER FALL 2025 REPORTER

FIGHTING EPA ROLLBACKS

WHY UNDOING EPA'S ENDANGERMENT FINDING WOULD ENDANGER US ALL

OUR CLIENTS IN THIS MATTER

The NAACP

Missouri Coalition for the Environment
Metropolitan Congregations United
Breathe Better.

In 2009, the Environmental Protection Agency (EPA) issued one of the most important climate rulings in U.S. history. The Endangerment Finding concluded that six greenhouse gases (GHGs) — including carbon dioxide and methane — “endanger both the public health and the public welfare of current and future generations.” Because of this, the EPA is authorized under the Clean Air Act to regulate GHG emissions as pollutants.

Now, more than a decade later, the EPA is proposing to rescind the Endangerment Finding — a move that would weaken climate protections at the very moment we need them most.

The Science Has Only Grown Stronger

The Endangerment Finding was built on a large body of scientific evidence. It drew from the U.S. Global Change Research Program, the Intergovernmental Panel on Climate Change, the National Research Council, and hundreds of peer-reviewed studies. Since then, the science has only become clearer and stronger.

To suggest otherwise ignores decades of research showing how greenhouse gases drive climate change, intensify extreme weather, and threaten public health. The claim by those who support the rollback (that EPA “unreasonably” analyzed the science record) is based on a single flawed report. If anything, the last 15 years of record-breaking floods, heat waves, and wildfires make this decision from the EPA all the more clear: greenhouse gases endanger us all.

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OUR MISSION

Founded in 2002 by Lewis C. Green, Great Rivers Environmental Law Center is a Missouri-based nonprofit committed to safeguarding natural resources, advocating for clean energy and environmental justice, and assisting communities in protecting their health through expert legal support.

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A LETTER FROM LEADERSHIP

Fall is one of my favorite seasons—a time when our parks, trails, and forests remind us just how much beauty there is in Missouri and Illinois. Cooler air and changing colors make it easier to step away from the headlines and enjoy the simple act of being outside.

But even as we take comfort in the season, we know these landscapes—and the people who depend on them—need constant protection. That's why I am excited to share that Great Rivers Environmental Law Center has recently filed a new complaint against the U.S. Forest Service, challenging a road-building plan that would undermine wilderness protections in southern Illinois. You can read more about that case in this newsletter, but what I want to underscore here is what it represents: our commitment to keeping public lands truly wild.

Public lands are just one piece of the bigger picture. At Great Rivers Environmental Law Center, our work extends across land, air, water, climate change, and environmental justice—all deeply interconnected, and all essential to the health of our communities. Whether it's defending clean water from industrial contamination, fighting harmful air pollution permits, or ensuring that communities most burdened by pollution have a voice, we are using the power of the law to safeguard what matters most.

I am proud of the matters we've taken on this year, and even prouder of the community of supporters that makes this work possible. With your partnership, Great Rivers Environmental Law Center can continue to defend the environment not just for today, but for generations to come.

As the leaves change this fall, I hope you'll take time to enjoy our shared landscapes—and know that Great Rivers Environmental Law Center is here, working every day to keep them safe.

With appreciation,

A handwritten signature in black ink that reads "Natalie Johnson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Natalie Johnson
 Executive Director



DATA CENTERS AND ENERGY

AN EMERGING CHALLENGE TO ENVIRONMENTAL PROTECTION

OUR PARTNERS IN THIS MATTER

Sierra Club

Across the country, data centers are springing up to power everything from online shopping to artificial intelligence. These buildings, packed with rows of computer systems, already consume about 4% of U.S. electricity — and federal energy experts project that demand could double or even triple within the next few years (*U.S. Department of Energy*). With this boom, states like Missouri and Kansas are racing to attract new data centers, and utility companies are adjusting new rate plans to fit.

Here in our region, Evergy and Ameren have filed requests with state utility regulators, for new “Large Load Power Service” tariffs. These special rate plans would govern how utilities charge high use (or “large load”) customers like data centers. Evergy alone predicts up to 6 gigawatts of new demand over the next decade, much of it tied to these facilities. The question, in many cases, isn’t just whether data centers are coming; it’s how we choose to power them, and who pays the cost.

Why It Matters

The question becomes what does it take to provide the power necessary to run these facilities. Not only do they require enormous amounts of energy and water, but to meet their energy demand, utilities often push for new gas plants or delay coal retirements, locking in more fossil fuels rather than renewable options. And when utilities build new lines, plants, or infrastructure, those costs are often spread to existing customers through rate increases. Low-income households, who already spend a higher share of income on energy, get hit the hardest. These communities are also more likely to live near polluting power plants and bear the brunt of health impacts.

Kansas vs. Missouri

With the encouragement of tech companies, environmental groups and other stakeholders, Evergy has agreed to include in its proposed large load tariff plans some protections for existing customers and has pledged to expand renewable energy to help meet increased demand. In Kansas, this has resulted in most of the parties in the case signing on to a settlement agreement that was presented to the Kansas Corporation Commission.

In Missouri, it’s a different story. The Missouri Public Service Commission’s staff opposes Evergy’s proposed tariff, asserting that it would shift too much cost onto everyday customers while rewarding utility shareholders. Because of Staff’s opposition, Evergy’s Missouri tariff case proceeded to a full hearing in early October, and it is unclear whether their proposed tariff will be approved. We anticipate similar constraints to be an issue in Ameren’s proposed tariff case, set for hearing in mid-November.

Our Role

At Great Rivers Environmental Law Center, we believe the Midwest can make smart choices as new data centers are constructed in the region. We are representing our partner, Sierra Club, to intervene in the pending large load tariff cases to ensure that utility companies.

- Expand renewable energy instead of relying on more fossil fuels

- Protect existing customers from bearing the burden of increased usage with rate increases

- Safeguard communities and natural resources from pollution and overuse

The choices made today will shape our region’s energy future for decades. Growth can happen — but it must happen responsibly, in ways that protect people, resources, and the environment as a whole.

FIGHTING EPA ROLLBACKS (cont'd)

WHY UNDOING EPA'S ENDANGERMENT FINDING WOULD ENDANGER US ALL

Why It Matters to Missouri and the Midwest

Here in Missouri and across the Midwest, we are already feeling the effects. Stronger storms have flooded rivers and levees. Longer, hotter summers put children, seniors, and outdoor workers at risk. Rural and low-income communities, which often have the fewest resources to adapt, face the heaviest burdens.

If EPA rescinds the Endangerment Finding, it would lose its ability to regulate greenhouse gases under the Clean Air Act. That would mean more pollution, more extreme weather, and more harm to the communities least able to afford it.

Our Concern and Our Call

At Great Rivers Environmental Law Center, we are deeply concerned that rescinding the Endangerment Finding would take away one of the most important tools the nation has to fight climate change. When pollutants threaten public health and welfare, the EPA must have what it needs to act.



Photo: Tatiana Grozetskaya, shutterstock.com

The Center has joined with advocates both locally and across the country in drafting comments urging the EPA to uphold the Endangerment Finding. Protecting the health of current and future generations depends on it.

KEEPING LAND WILD IN MISSOURI

WORKING TOGETHER TO PRESERVE MISSOURI'S WILD AND OPEN SPACES

Over the last year, Great Rivers Environmental Law Center has partnered with Ducks Unlimited and Ozark Land Trust, two non-profits with a mission to protect natural places, to draft **conservation easements** that will forever preserve open space and wild lands in Missouri.

Our attorneys have been working side by side with project managers, reviewing titles and negotiating easement terms to ensure these unique properties remain safeguarded forever. As opposed to public lands, a conservation easement allows a landowner to keep many private property rights. In the fight to preserve natural spaces, this option encourages landowners to create these agreements by providing potential tax benefits and allowing them to retain ownership. It also gives opportunities for organizations like Ducks Unlimited and Ozark Land Trust to monitor and enforce these protections over time, providing needed accountability.

WHAT IS A CONSERVATION EASEMENT?

A voluntary legal document that allows a landowner to permanently protect a property that has natural, historical, ecological, and open space value.

At a moment when many environmental safeguards are being rolled back, this work shows another path forward: permanent, voluntary conservation that benefits landowners, partner organizations, and the public alike. A true win-win-win.

PROTECTING OUR PUBLIC LANDS

A ROAD THROUGH THE LUSK CREEK WILDERNESS

One of many Lusk Creek natural waterways. Photo: Karen Frailey, wildernesswatch.org

Step into the Lusk Creek Wilderness and you'll find quiet valleys, winding trails, and a forest that feels untouched by time. It's one of the most treasured parts of the Shawnee National Forest — land that was meant to stay wild forever.

That promise is now under threat. In January, the U.S. Forest Service (USFS) approved the construction of a permanent road through the wilderness area to provide access to private land located outside of the wilderness boundary.

This decision violates the Wilderness Act, which bans roads, motor vehicles, and mechanized activity in wilderness areas. While the USFS argues that the project is needed to provide access to private lands, the **Wilderness Act** does not provide an exception to its bans on roads for access to private lands located outside of the wilderness.

Implementation of the project will have negative environmental impacts, including the clearing of trees, habitat fragmentation, and disturbance of the area's wilderness character.

In 1990, the **Illinois Wilderness Act** set aside seven separate parcels of land, including The Lusk Creek Wilderness, as a roadless area within the national forest.

To justify the project, the agency leaned on the Alaska National Interest Lands Conservation Act (ANILCA), which does not apply to public lands in Illinois. Even if it did, the project would still be in violation of that very act, as well as the Wilderness Act, the National Forest Management Act (NFMA), and the National Environmental Policy Act (NEPA).

Lusk Creek Wilderness an area of 6,293 acres within the Shawnee National Forest, the largest and most remote designated wilderness in Illinois.



Photo: Bob Wick, placesandpics.com

Normally, NEPA requires that construction of this type would have an environmental review, which would outline the impact and provide alternative solutions, but USFS incorrectly argues that they do not have to do that in this instance.

A Larger Story: Stewardship of Public Lands

This fight is not just about one road, but about the safety of national public lands. Across the country, millions of acres managed by the USFS and the Department of the Interior serve the public good — whether as national forests, wilderness areas, rivers, or trails.

Great Rivers Environmental Law Center also played an important role in the Ozark National Scenic Riverways Roads and Trails Management Plan, helping local organizations and the public navigate complicated issues about road and trail access. That work ensured that decisions about visitor access did not come at the expense of protecting the rivers and lands that make the park so valuable.

Standing Together for Wilderness

In Southern Illinois, we are proud to stand with Heartwood, a grassroots network of forest defenders throughout the eastern United States, and Wilderness Watch, a national nonprofit dedicated to protecting the National Wilderness Preservation System.

OUR PARTNERS IN THIS MATTER

Heartwood
Wilderness Watch

Together, we are challenging the Lusk Creek Wilderness decision in order to uphold the law and protect the character of the wilderness while keeping accountable those meant to protect it.

FROM CONCERN TO POWER

NEIGHBORS UNITE AGAINST FACTORY FARMS

Confined Animal Feeding Operations (CAFOs) are spreading quickly across Missouri, putting rural communities and fragile water systems at risk.



Photo: Getty Images

In response, Great Rivers Environmental Law Center helped residents of Newton and Barry Counties form a new nonprofit, Protect Our Water, Environment and Resource (POWER). Together, they organized to oppose eight chicken CAFOs planned in their community.

Great Rivers Environmental Law Center then worked with POWER to draft and submit technical and legal comments to the Missouri Department of Natural Resources, making sure the community's concerns were clearly heard and supported by strong science and law.

Why It Matters

The Wilderness Act was written to secure “for present and future generations the benefits of an enduring resource of wilderness.” For our clients and their members, Lusk Creek Wilderness is a place for hiking, solitude, science, recreation, and renewal. Roads and motor vehicles would strip away the very qualities that make it special, damaging plant and wildlife spaces.

By engaging in these fights — from the Ozarks to the Shawnee — Great Rivers Environmental Law Center helps protect the promise of public lands. Once a road is cut through wilderness, it can never truly be undone. That's why we're standing with our partners to keep Lusk Creek — and all our public lands — wild for generations to come.

OUR CLIENTS IN THIS MATTER

Protect Our Water, Environment
and Resources (POWER)

Northern Missouri has long been home to large hog operations, but the southwest corner of the state is now seeing a rapid rise in chicken CAFOs.

The poultry industry is drawn to this region because it is close to Tyson's headquarters in northwest Arkansas. Karst terrain — full of caves, springs, and underground streams — makes the region especially vulnerable to groundwater pollution. Waste from these facilities, and the practice of spreading it on fields, can easily contaminate water sources that people depend on.

WILD FOR JUSTICE

A RECAP OF OUR CELEBRATION & FUNDRAISER

On September 27, we held our signature annual event, Wild for Justice: Lewis C. Green Awards Celebration & Fundraiser. The evening brought together supporters, partners, and community members to celebrate environmental leadership and raise critical funds and awareness.

This year's event honored two outstanding award recipients:

Sara Parker Pauley, former Director of the Missouri Department of Conservation and president of the Association of Fish & Wildlife Agencies, was recognized for her trailblazing career in natural resource management and her lifelong commitment to protecting Missouri's wildlife, lands, and waters.

The Missouri NAACP, honored for its steadfast leadership in advancing environmental justice. The organization has worked tirelessly to ensure that civil rights are upheld in environmental decision-making, standing with communities disproportionately affected by pollution and harmful land use practices.

Proceeds from the event will directly fund the Center's legal advocacy, supporting cases that defend public lands, protect clean water, challenge harmful air pollution permits, and promote environmental justice as Missouri's only nonprofit, public-interest environmental law firm. We would like to share a special thank you to our event sponsors who make the work that we do every day possible.

MO NAACP accepting their award



Photo: Briannah Anderson

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MISSOURI

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RETURN SERVICE REQUESTED

INSIDE: DATA CENTERS, EPA ROLLBACKS, AND THE BATTLE FOR CONSERVATION IN MISSOURI AND ILLINOIS

Great Rivers Environmental Law Center is a 501(c)3 nonprofit law center working to protect the environment and public health of Missouri and Southern Illinois. Because of you, we're fighting for cleaner air and water, protected parks and wild lands, a shift toward renewable energy, and a stronger voice for communities. Your support powers the legal action needed to defend these vital resources.