

EXHIBIT D



1000 Vermont Avenue, NW
Suite 1100
Washington, DC 20005
Main: 202-296-8800
Fax: 202-296-8822
www.environmentalintegrity.org

March 2, 2018

Via FOIAonline submission.

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460

Re: Freedom of Information Act request for EPA records of Travel Expenditures for Administrator Pruitt and for any EPA Staff Accompanying the Administrator from August 18, 2017 through March 2, 2018

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, the Environmental Integrity Project and Chesapeake Climate Action Network (collectively referred to as “Requesters”) hereby request the following records held by the U.S. Environmental Protection Agency (EPA):

Records Requested

- Records of travel expenditures for all travel outside of Washington, DC by Administrator Pruitt, from August 18, 2017 to March 2, 2018.
- Records of travel expenditures for all travel outside of Washington, DC by any and all EPA staff accompanying Administrator Pruitt, including, but not limited, to any EPA staff assigned to security detail for the Administrator, from August 18, 2017 to March 2, 2018.

Scope of Records

The term “travel” includes both commercial travel and non-commercial travel, including, but not limited to, travel by chartered aircraft and travel aboard U.S. Government aircraft.

Format of Records

EPA has provided records of travel expenditures for Administrator Pruitt and accompanying staff from June 5 through June 12, 2017 in response to a separate August 3, 2017 FOIA request submitted by EIP. *See Attachment A.* Requesters will accept disclosure of travel expenditures in a similar format as the earlier records provided by EPA.

Claims of Exemption from Disclosure

If you regard any documents as exempt from required disclosure under FOIA, please exercise your discretion to disclose them nevertheless, keeping in mind that FOIA “is the most prominent expression of a profound national commitment to ensuring an open Government” and that “[a]ll agencies should adopt a presumption in favor of disclosure.” President Barack Obama, Memorandum For the Heads of Executive Departments and Agencies: Freedom of Information Act, 74 Fed. Reg. 4, 863 (Jan. 26, 2009).

In the alternative, after careful review for the purpose of determining whether any of the information is exempt from disclosure, please provide all reasonably non-exempt portions of records and communications as required by FOIA.

Should you elect to invoke an exemption, please provide the required full or partial denial letter and sufficient information to determine whether or not there may be grounds to appeal EPA’s decision. In accordance with the minimum requirements and regulations of due process, this information should include:

- Basic factual material, including the originator, date, length, and addresses of the withheld items.
- Explanations and justifications for denial, including the identification of the exemption applicable to the withheld information or portions of the information found to be subject to exemption, and how each exemption applies to the withheld material.

Waiving Request for Fee Waiver

This FOIA request meets the case-by-case requirements for a fee waiver, by satisfying each of the six factors which must be met to qualify for a fee waiver under EPA regulations found at 40 C.F.R. § 2.107. However, although we are entitled to a fee waiver, we are waiving any request for a waiver of fees.

Opportunity to Provide Clarification

If I can provide any additional information or answer any questions that can help to clarify or limit this request, please do not hesitate to contact me at (202) 888-2701 or via email at slam@environmentalintegrity.org.

Thank you for your assistance with this FOIA request, and I look forward to hearing from you.

Sincerely,



Sylvia Lam
Attorney

Environmental Integrity Project
1000 Vermont Avenue NW
Suite 1100
Washington, DC 20005
(202) 888-2701

Anne Havemann
General Counsel
Chesapeake Climate Action Network

Enclosure:

Attachment A: EPA Records of Travel Expenditures for Administrator Pruitt and Staff from June 5 through June 12, 2017

From: [Sylvia Lam](#)
To: [Sanghyun Lee](#)
Subject: FW: FOIA Request EPA-HQ-2018-005041 Submitted
Date: Tuesday, August 21, 2018 9:40:38 AM

From: foia_hq@epa.gov <foia_hq@epa.gov>
Sent: Friday, March 2, 2018 1:08 PM
To: Sylvia Lam <slam@environmentalintegrity.org>
Subject: FOIA Request EPA-HQ-2018-005041 Submitted

This message is to confirm your request submission to the FOIAonline application: [View Request](#). Request information is as follows:

- Tracking Number: EPA-HQ-2018-005041
- Requester Name: Sylvia Lam
- Date Submitted: 03/02/2018
- Request Status: Submitted
- Description: Please see attached FOIA request letter.