Pipeline Safety TRUST

Credible.
Independent.
**In the public interest.**

January 15, 2025

The Honorable Paul Roberti, Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Request to Update Office of Pipeline Safety Organization Chart**

Dear Administrator Roberti:

I am writing again[1] on behalf of Pipeline Safety Trust[2] regarding the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) lack of update on its Office of Pipeline Safety (OPS) Organization Chart. It has been nearly a year since PHMSA's OPS has updated this chart, a failure which PST views as a failure of transparency and accountability to the public.

As you know, Congress has expressed heightened interest in PHMSA's operations, and public transparency and good governance strongly support keeping basic institutional information current.[3] I write again because at this point, the absence of an updated organization chart is no longer a temporary delay but a persistent transparency gap with concrete consequences.

Maintaining outdated organizational information creates avoidable operational and legal risk for the agency. Members of the public, regulated entities, and other stakeholders reasonably rely upon the agency's published structure to determine where to direct submissions, complaints, petitions, and inquiries. When that information is inaccurate it increases the likelihood of misdirected filings, procedural errors, and confusion about

[1] Letter from Erin Sutherland, Policy & Program Director/Counsel, Pipeline Safety Trust to Paul Roberti, Administrator, Pipeline and Hazardous Materials Safety Administration (November 6, 2025) https://pstrust.org/wp-content/uploads/2025/11/PST-Letter-to-PHMSA-re-Org-Chart-Update-1.pdf.

[2] Pipeline Safety Trust is a nonprofit watchdog organization dedicated to keeping people and the environment safe from pipeline hazards. Its mission is to promote pipeline safety through education and advocacy, increased access to information, and partnerships with residents, safety advocates, government, and industry, resulting in safer communities and a healthier environment. For more information, visit www.pstrust.org.

[3] Given that PHMSA's Office of Hazardous Materials Safety has updated its organization chart multiple times over the past year, including as recently as January 12, 2026, the continued absence of an update reflects not an inability to do so, but a decision not to prioritize it. PHMSA, Office of Hazardous Materials Safety Organization Chart (January 12, 2026) https://www.phmsa.dot.gov/about-phmsa/offices/office-hazardous-materials-safety-organization-chart.

where authority is delegated within the agency, all of which undermine orderly participation in agency processes, complicate oversight and accountability, and substantially reduce the efficiency and effectiveness of OPS. PST is aware that multiple senior career positions within OPS, including at the associate administrator, deputy associate administrator,and division director levels, have experienced turnover over the past year. The published organization chart does not reflect these changes, meaning the agency is actively publishing information that stakeholders cannot rely upon.

The continued publication of outdated structural information also risks undermining OPS's credibility, as the agency appropriately emphasizes accuracy and transparency in other contexts, such as operator submissions and regulatory compliance, yet its own institutional information has not been maintained to that same standard.

For these reasons, PST respectfully requests that the agency either publish an updated organization chart reflecting its current structure and leadership or clearly state whether and when such an update is expected. Thank you for your attention to this important matter. We welcome PHMSA's prompt action and look forward to your response. If you have any questions or would like to discuss this letter, please contact me at erin@pstrust.org or (360) 543-5686 x 107.

Sincerely,

Erin Sutherland

Erin Sutherland
Policy & Program Director/Counsel

cc: Michael Garcia