Holland & Hart



## PRACTICES

Environmental
Climate Change
Environmental Transactions
Environmental Health and Safety
State Government Affairs
Federal Affairs
Federal Lands Permitting
Energy Consumers, Developers, and Public Utilities

## INDUSTRIES

Energy and Resources
Oil and Gas
Renewable Energy and Storage
Data Centers

## EDUCATION

University of Denver, J.D.

Johns Hopkins University, M.A., Government

University of Colorado, B.A.

## BAR ADMISSIONS

Colorado

# Doug Benevento

Partner

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**An environmental and regulatory attorney with decades of senior government experience, Doug helps clients navigate complex environmental regulatory issues and is an experienced, effective expert witness.**

Doug counsels companies across industries on some of the most consequential issues in energy and environmental law, including climate change and environmental justice. He also has particular expertise in PFAS and other emerging contaminants, advising clients on state and federal matters, from navigating a growing patchwork of state bans to working with passive receivers on federal legislation. He helps clients develop permitting and compliance strategies and represents them in enforcement actions and rulemaking proceedings before state and federal agencies. His experience as a senior executive at Xcel Energy gives him a corporate perspective on the challenges companies face navigating overlapping and often competing regulatory regimes.

Doug's perspective is shaped by high-level leadership roles at federal and state environmental agencies, including serving as the EPA's Acting Deputy Administrator and Administrator of EPA Region 8. He spent almost a decade on Capitol Hill, advising members of Congress on environmental and natural resource legislation. He also served as the Executive Director of the Colorado Department of Public Health and Environment. This experience across federal, state, and legislative venues gives Doug a firsthand vantage point on how environmental rules are written, implemented, and enforced.

His government and private sector experience make Doug an effective expert witness. He has served in matters spanning tort, insurance, and state regulatory proceedings, bringing courts and clients a rare combination of agency-side credibility and practical knowledge of environmental standards and enforcement.

As a member of the firm's Environmental, Energy, and Federal Affairs teams, Doug helps clients assess federal priorities, opportunities, and risks, and build strategies to advance their objectives with Congress and executive branch agencies. Drawing on his years on Capitol Hill and at EPA, along with longstanding relationships with regulators and legislators across the Mountain West and in Washington, D.C., he helps clients anticipate regulatory and legislative developments and advocate for solutions through legislative, regulatory, and administrative channels.

## EXPERIENCE

Doug counsels clients on:

- PFAS regulatory requirements
- Hazardous waste enforcement and site remediation
- Environmental Justice and Title VI of the Civil Rights Act
- The Clean Air Act
- ESG and Corporate Sustainability Reporting
- Climate issues and Greenhouse Gas (GHG) standards and accounting rules
- Developing strategies in rulemaking comments
- Development of effective government affairs strategies

Doug has sophisticated experience advising clients on key state and federal environmental issues and policies including:

- PFAS
- Ethylene Oxide
- The Civil Rights Act and Title VI
- The Clean Air Act (CAA)
- The Clean Water Act (CWA)
- The Bald and Golden Eagle Protection Act (BGEPA)
- The federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- The Resource Conservation and Recovery Act (RCRA)
- Environmental regulation in multiple states

## PUBLICATIONS

"Colorado Launches State Dredge-and-Fill Program (Regulation 87) ," *Environmental Law Update*, August 6, 2026

"Now the EPA Shutdown Really Begins," *Federal Affairs Update*, October 22, 2025

"Don't Get Caught Off Guard: Essential Shutdown Preparation for Federal Projects," *Federal Affairs Update*, September 22, 2025

"Summary of Trump Administration's Release of AI Action Plan," *Federal Affairs Update*, July 24, 2025

"EPA Proposes Sweeping Repeal of GHG Standards for Fossil Fuel-Fired Power Plants," *Environmental Update* , June 18, 2025

"House Appropriations Committee Issues Fiscal Year 2026 Community

Project Funding Guidance," *Federal Affairs Update*, April 15, 2025

"What's on Congress' PFAS Agenda? ," *PFAS Update*, May 21, 2024

"State Level PFAS Regulations Are Coming: Are You Ready?," *PFAS Update*, May 8, 2024

"EPA Imposes Stringent Greenhouse Gas Rule for Fossil Fuel-Fired Power Plants," *Air Quality Update*, April 25, 2024

"CERCLA Liability Heats Up: EPA Designates PFAS Chemicals Hazardous Substances," *PFAS Update*, April 23, 2024

"Colorado GHG Roadmap 2.0 ," *Air Quality Update*, March 18, 2024

"Colorado Legislative 2024 Preview: Energy and Environmental Issues," *Government Affairs Update*, January 5, 2024

"GHG Standards for the Power Sector: Is Third Time the Charm or Is It Déjà Vu?," *Holland & Hart Legal Update*, May 15, 2023

"Back to the Future: The Biden Administration Releases Final WOTUS Rule," *Holland & Hart Client Alert*, January 5, 2023

## RECOGNITION

- *Chambers USA*, Up and Coming, 2007-2009, 2025; Environment 2026

## PROFESSIONAL AND CIVIC AFFILIATIONS

- Douglas County Board of Health, President, 2021 – Present
- Colorado Chamber of Commerce, Energy & Environment Council, Chair
- Gulf Coast Ecosystem Restoration Council, Chair designee
- Lawrence Berkeley National Laboratory, Electric Utility Regulation Advisory Group, Past Member
- Edison Electric Institute, External Affairs Committee, Past Vice-Chairman
- Douglas County Board of Education, Past elected Director and Vice-President, 2009-2016
- National Advisory Environmental Health Sciences Council, Past Member
- Colorado Governor's Emergency Expert Epidemiology Response Committee, Past Chair
- Environmental Council of States, Past Member and Executive Committee Member