

# NORTHWEST DEFENSE

The newsletter of the Northwest Environmental Defense Center  
Spring 2008

## INDUSTRIAL STORMWATER ENFORCEMENT: PREVENTION IS THE BEST MEDICINE

Much of NEDC's environmental advocacy work over the years has focused on clean water. We routinely comment on water pollution discharge permits, and challenge those permits when necessary. We also have one of the most effective Clean Water Act enforcement programs in the nation. In recognition of our efforts to get industrial polluters to clean up their act, we have been dubbed "Kayak Crusaders" by the Oregonian newspaper, and have been asked to give presentations describing our approach at conferences across the country, including at a recent conference in Baltimore, Maryland sponsored by the Chesapeake Bay WaterKeeper Alliance.

We locate prospective enforcement targets by a variety of means, including independent surveillance and water quality monitoring, tips we receive over the phone, or through document review. Last November, a scrap metal yard in North Portland found its way onto NEDC's Clean Water Act enforcement target list in a very interesting way. By simply reviewing maps of local sewage infrastructure, we identified an entire urban industrial neighborhood at risk of major pollution problems. It certainly appeared to us that whenever it rained, industrial properties in the neighborhood of concern discharged stormwater straight to the nearest waterway. Only when we visited the neighborhood in person did we see that it harbored one of the messiest industrial sites we've ever dealt with, Kosta's Scrap Metals, Inc.

The owner of the scrap yard had long been under the impression that stormwater from his property, heavily contaminated with toxic pollutants, flowed to Portland's sewage treatment plant prior to discharge. The Oregon Department of Environmental

Quality (DEQ) operated under the same impression, and it had shrugged off an anonymous tip phoned into the agency last fall from a scrap yard customer who had witnessed a significant volume of used oil, anti-freeze and unidentified sludge dumped directly into the storm drain at the center of the property.

As it turned out, the scrap yard's storm drain conveyed polluted stormwater and process wastewater to a pipe that previously connected to a trunk line that flowed to the sewage treatment plant. As recently as last August, but possibly as much as a year or two previously, the city of Portland's Bureau of Environmental Services disconnected the line and permanently diverted the flow directly to a local waterway. Unfortunately, the city had failed to notify any of the local property owners of this work, and the property owners hadn't taken it upon themselves to investigate whether maintenance work underneath a highly

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## NEDC

10015 SW Terwilliger Blvd.

Portland, OR 97219

p. 503.768.6673

f. 503.768.6671

[www.nedc.org](http://www.nedc.org)

# BOEING INSTALLS EMISSION CONTROL TECHNOLOGY

In June, 2007, The Boeing Company submitted an application to the Oregon Department of Environmental Quality (DEQ) to increase the company's Volatile Organic Compounds (VOC) emissions limit from an airplane painting facility at Portland International Airport from 39 tons per year to 99 tons per year. This significant increase was of particular concern because VOCs react



with oxides of nitrogen in the presence of water and sunlight to form ozone. Numerous ailments are associated with ground level ozone pollution including acute respiratory problems, aggravation of asthma and the impairment of immune system defenses. Several NEDC volunteers attended an initial hearing held by DEQ and made contact with a group of neighbors who were concerned with the proposal. Over the next several months, NEDC Air Project Coordinator Johannes Epke and first-year student volunteer Mitch Tsai worked closely with this network of community members to form Northeast Neighbors for Clean Air (NENCA) and oppose the proposed emission increase. The group was diverse and tenacious, mounting a concerted opposition and tackling the issue from many directions. The group circulated petitions, contacted elected officials, pressured Boeing officials, and communicated frequently with DEQ about the proposal.

Because Boeing was requesting an increase above the Significant Emission Rate (SER) for VOCs, the company was required to submit a New Source Review application and perform a Best Available Control Technology (BACT) analysis. A top-down BACT analysis first requires that the applicant identify all control technology options and list them from most stringent to least. The most stringent option must be chosen, taking into consideration factors including cost, energy use, and other non-air environmental impacts. Boeing

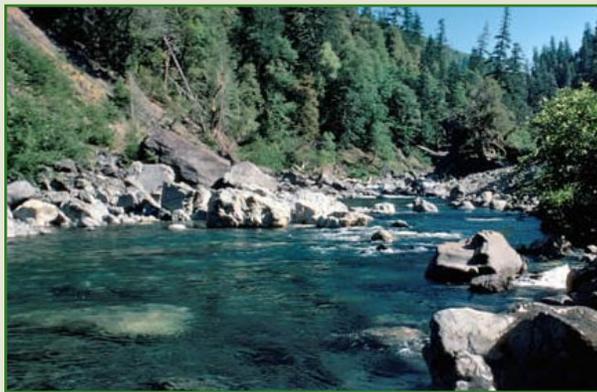
correctly identified all applicable control technology, and performed a detailed analysis showing the cost of each option in dollars-per-ton of VOC removed. The conclusion of Boeing's analysis was that all end-of-stack control technology was too expensive, meaning that BACT for the facility would be practices already in place at the facility. NEDC raised concerns with Boeing's analysis to DEQ, specifically concerns regarding Boeing's calculations of the cost of end-of-stack control options such as thermal oxidation. In Boeing's application, each of the two hangars at the facility were treated separately without any showing that no control options were available for treatment of air-flow from both hangars. DEQ responded to this concern and requested that Boeing supplement its application with, among other things, a BACT analysis that included the possibility of one control system being used for both hangars.

After several months of pressure from the coalition, Boeing decided to pull its application and agreed to voluntarily install control technology to keep emissions below the previously permitted limit of 39 tons per year. Boeing cited community pressure among other reasons for taking this course of action. The single concentrator/RTO emission control system that Boeing has proposed will cost an estimated \$7 million and will control emissions from both hangars. The NENCA members celebrated successfully pressuring a corporation to take their concerns into account, but also planned to stay involved. Since being notified of the decision, NENCA members have visited the Boeing facility for a meeting with representatives from Boeing and DEQ, and for a tour of the facility. In addition to keeping a watchful eye on Boeing's progress, NENCA members have been discussing the possibility of the group addressing other air pollution concerns in the disproportionately polluted NE Portland area. NEDC volunteers Johannes Epke and Mitch Tsai both had a great experience working with Robin Denburg and other NENCA members throughout this process.

# FEDERAL AGENCY ATTEMPTS BLANKET AUTHORIZATION OF GRAVEL EXTRACTION IN OREGON'S CHETCO RIVER

Each summer, on a massive scale, river gravel is gouged directly out of the active channel of the Chetco River on Oregon's southern coast. One gravel mine operator alone, Freeman Rock, Inc., has been authorized to strip 100,000 cubic yards (well over 100,000 tons) of gravel out of the river each year. The loss of river gravel on this scale, coupled with destructive mining practices, results in devastating ecological impacts on the Chetco and the species that depend upon it. The Chetco, in the vicinity of the Freeman operation, is used by adult and juvenile coastal coho (*oncorhynchus kisutch*) as a migration corridor, and by juveniles as rearing habitat. The area affected by Freeman's operations is also designated as essential habitat for various life stages of groundfish, coastal pelagic species and Pacific salmon. The upper 44.5 miles of the 55.5 mile-long Chetco are federally-designated as Wild and Scenic, stretching up towards the river's headwaters in the Kalmiopsis Wilderness.

The lower 11 mile-long section, however, is the target of large-scale gravel extraction activity. This activity contributes to the listing of the lower stretches of the Chetco as water-quality limited for habitat and flow modification. The National Marine Fisheries Service, in comments regarding Freeman's gravel extraction activity, stated that this activity results in "the destruction of stream bottom and riparian habitat resources that will cause habitat changes that will lead to loss of preferred food resources, reduced growth, increased predation, increased mortality, altered competitive relationships, and reduced fish populations." Despite these findings of significant negative impacts on the Chetco, Freeman was only one of the gravel mining projects approved last year by the U.S. Army Corps of Engineers.



In an effort to "reduce the amount of paperwork and time" necessary to authorize gravel mining in the Chetco River, The Corps is proposing a new regional general gravel mining permit for all current and prospective future gravel mining activities in the river. The Corps has determined that site-specific analysis, and the tailoring of project-specific measures necessary to protect federally-listed endangered species, is overly burdensome, so the agency is moving forward with the Chetco regional general permit. This permit, the agency hopes, will serve as a "template to evaluate other river systems in Oregon" as well.

Typical of the Orwellian double-speak for which Bush Administration federal agencies have become notorious, the Corps' own proposal expressly states that the practice of general permitting is only appropriate for activities that "have minor individual and cumulative adverse impacts on the aquatic environment". It remains unclear how the agency has determined that multiple gravel extraction projects along many miles of the Chetco, each involving the use of heavy excavation equipment, resulting in the annual removal of many hundreds of thousands of tons of gravel from below the high-water mark in the river bed constitutes activity that has only minor impacts on the river's aquatic environment.

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# NEDC CHALLENGES OREGON'S GENERAL STORMWATER DISCHARGE PERMITS

By DREW KERR, SECOND-YEAR STUDENT VOLUNTEER

Thirty-six years after the Clean Water Act first sought to address the pernicious discharges polluting our nation's waters, stormwater discharges from industrial facilities remain among the most significant sources of toxic contaminants. Stormwater routinely transports a variety of pollutants over the impermeable surfaces of industrial facilities into local waterways.

In 2003, NEDC and Columbia Riverkeeper (CRK) brought as-applied and site-specific challenges to Oregon DEQ's 1200-Z NPDES General Stormwater Permit, and the issuance of that permit to Sundial Marine. The Permit's flaws included inadequate public notice and participation, lack of obligatory compliance with water quality standards (WQS), reliance on unenforceable benchmarks and best management practices rather than enforceable technology based effluent limits, and numeric guidelines set five times above the applicable WQS.



Following a year of negotiations, NEDC, CRK, and DEQ settled

in 2004. DEQ agreed to revise the Permit with terms including improved notice and comment on each permit application and Stormwater Pollution Control Plan (SWPCP), mandatory compliance with WQS, conversion to effluent limits for facilities failing to attain benchmarks, and monitoring improvements. The parties scheduled notice and comment, and finalization of the revised Permit for 2005. DEQ breached the settlement. Faced with a claim for breach of contract, DEQ agreed to a revised timeframe. Although DEQ complied with the revised timeline, the permit's substantial flaws went largely unaddressed. Many comment responses indicated increased acquiescence to industry demands.

In 2006, NEDC student volunteers commented on the first round of facilities seeking coverage under the revised 1200-COLS Permit, regulating discharges into the Columbia Slough. In March 2007, NEDC and CRK filed as-applied and site-specific challenges to the 1200-COLS Permits. In 2007, NEDC student volunteers commented on another round of facilities seeking coverage under the revised 1200-Z Permit, regulating discharges into other Oregon waters. With the 1200-COLS challenges pending, DEQ issued the first round of 1200-Z Permits. Shortly thereafter, NEDC and CRK

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# FIRST YEAR STUDENT'S VOLUNTEER EXPERIENCES

By TARA ZUARDO, FIRST-YEAR STUDENT VOLUNTEER

My involvement with NEDC's Lands/Wildlife and Factory Farms groups has provided me with extremely valuable lessons on research, public commenting, and the logistics of working with agencies in order to get important work done.

In the **Lands and Wildlife group**, issues related to the Endangered Species Act (ESA) have been a primary focus of our efforts for much of the year. One of the projects students have been researching involves protection for the imperiled Washington ground squirrel. The US Fish and Wildlife Service has found that the species is eligible for listing under the Endangered Species Act (ESA), but that the agency has higher listing priorities preventing a formal listing at present. However, circumstances are about to change that may necessitate an emergency listing of the species. Currently, the Oregon Military Department is going through the NEPA process because it wants to build two new weapons training facilities on the Boardman Naval Weapons Systems Training Facility (BNWSTF). The BNWSTF happens to encompass about half the habitat of the Oregon population of the Washington ground squirrel. Last semester, several volunteers with guidance from former NEDC board member, Karen Russell, researched listing requirements under the federal and Oregon ESAs, and drafted a new listing petition. This semester volunteers continue to explore questions regarding the ground squirrel.

In addition, this semester we submitted comments on the status review for the 12-month finding on whether to list the pygmy rabbit under the ESA. The species faces potential threats from overgrazing and efforts by the Bureau of Land Management to improve grazing opportunities for cattle at the expense of native species, as well as from heavy oil and gas development. We also submitted comments during the scoping stage for grazing permit renewals in the Wallowa-Whitman National Forest, and comments are in development for the Steens recreation plan. Thank you to all the NEDC volunteers for keeping up the great work!

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# A MONSTEROUS MOUNTAIN OF TRASH

By CLAIRE TONRY, STUDENT VOLUNTEER

Lakeside Reclamation Landfill is an unlined construction and demolition dump located on prime farmland directly adjacent to the Tualatin River. Howard Grabhorn has owned and operated the Landfill for over fifty years, as it grew from its humble beginnings as a small trash heap to a towering mountain today. Throughout this time, Lakeside repeatedly accepted prohibited waste, including asbestos, chromium-treated animal hides, contaminated soil, and industrial wastes. Based on documentation in state and county agency files, it is evident that Lakeside contaminates the groundwater underneath it, has compliance problems with various land-use and building code laws, and creates a litany of nuisances for its neighbors.

For the media, Lakeside has become a symbol of what is wrong with environmental regulation and enforcement in Oregon – and an example of the important and painstaking work of NEDC.

For decades the Landfill's neighbors lodged formal complaints with the Oregon Department of Environmental Quality (DEQ) and elected officials to no avail. DEQ allowed Lakeside to operate freely, without so much as a fine for even serious, repeat permit violations. DEQ made excuses for Lakeside when politicians looked into the matter and generally treated Lakeside as a favored client. Last summer, though, things finally began to change for the better.

When a coalition of neighbors and groups including NEDC and Friends of the Tualatin River National Wildlife Refuge described the sorry state of operations at Lakeside, Portland's Metro Council decided to deny Lakeside an exemption from new recycling requirements. Metro then took the initiative to reconsider its contract with Lakeside, which may soon result in a ninety-percent reduction in the amount of waste – and money – that pile high at Lakeside.

Then in the fall, with Lakeside under increased DEQ scrutiny because of the Landfill's pending permit renewal application and continued pressure from the coalition, Lakeside accepted prohibited industrial



*Photo by andrewburdickphotography.com*

waste once again. Lakeside even buried the waste despite DEQ inspectors' direct instructions to leave the waste so the agency could test it for hazardous components. DEQ acknowledged that Lakeside acted recklessly and ultimately fined the Landfill. (Grabhorn, Inc. is currently contesting the fine.)

DEQ next issued a draft renewal permit for public comment. Here DEQ took a relatively pro-active stance by limiting Lakeside to only the most inert wastes, and proscribing closure of the Landfill a few years earlier than Lakeside has planned. NEDC was part of the standing-room-only crowd at a public hearing on the draft permit, and submitted substantial comments on the permit with the help of the Pacific Environmental Advocacy Center. NEDC commended DEQ for the agency's steps in the right direction but demanded more oversight of this rogue operator and treatment and prevention of Lakeside's ongoing contamination of Oregon's land, air and water.

During this process it came to the coalition's attention that Lakeside's own documents (on file with DEQ for years) suggest that the Landfill discharges contaminated water into a tributary of the Tualatin. At the coalition's behest, DEQ inspected the site in January and photographed multiple pipes discharging off-colored water as well as discolored water seeping out of the side of the landfill. NEDC and Friends of the Refuge quickly informed Mr. Grabhorn of their intent to sue Lakeside for violations of the Clean Water Act.

DEQ also informed Lakeside that it would either have to get a permit or stop the discharges. Fearing a fast-track permit process, the coalition met with DEQ to stress the importance of protecting the already-polluted Tualatin River. For his part, Mr. Grabhorn simply denied any problem. DEQ rejected Lakeside's excuses, committed to a public permitting process and will refer Lakeside for another penalty.

All of this comes as DEQ searches for a new director. DEQ employees reportedly suffer from low morale and the entire agency is routinely chastised in the press. So perhaps DEQ is at a turning point and the agency's small, but promising steps toward requiring compliance at Lakeside are signs of things to come for the rest of the state. In the meantime, NEDC, labeled the "the state's de facto environmental watchdog" recently by a columnist at the Oregonian newspaper, will press on.

*(Discharge Permits...Continued from page 4)*

renewed their challenges to the 1200-Z Permits, pressing DEQ to address its failure to meet the basic requirements of the Clean Water Act.

The revised Permits perpetuate many of their predecessors' flaws. Their development processes remained inadequate, omitting reasonable potential analyses among other steps required by the CWA and federal and state regulations. They retain perfunctory best management practices and unenforceable benchmarks in lieu of enforceable WQS-based effluent limits. They omit any language meeting the CWA's call to prevent direct or contributory violations of WQS. They presume compliance through SWPCP revision procedures, which, in practice, allow repeat violations of the Permits' arbitrarily inflated benchmarks for up to four years before DEQ would potentially commence enforcement action. Lastly, the Permits' overbroad application and deficient applicant inquiry requirements result in issuance to facilities better suited to individual stormwater or process wastewater discharge permits.

In the petitions for review and reconsideration, NEDC and CRK seek immediate compliance with WQS, establishment of permit coverage and development of effluent limits for all pollutants likely discharged by covered facilities, a narrowing of the number of industries and types of facilities covered by the permits, improved application review, monitoring with substantive oversight, and enforcement mechanisms.

Both the challenges are now in the discovery phase. The court granted NEDC's motion for consolidation on March 10. Attorneys at the Pacific Environmental Advocacy Center (PEAC), representing NEDC and CRK, are navigating a sea of motions, discovery requests, depositions, and the like, while preparing the initial briefs. With help from a hearty crew of student volunteers, NEDC, CRK, and PEAC are keeping an eye out for additional faulty 1200-COLS and 1200-Z Permit issuances. While NEDC's organizational scope expands, it continues its proud heritage of ensuring the State lives up to its Clean Water Act obligations to its citizens, communities, and natural resources.

*(Volunteer Student's Experiences...continued from page 4)*

Volunteers for the **Factory Farm Project Group** have focused on writing public comments concerning local factory farms registering for coverage under the Oregon General Clean Water Act permit for Concentrated Animal Feeding Operations (CAFOs). As the scale of modern CAFOs expands dramatically, so do the potential environmental and public health risks associated with their operations. Our comments focused on the failure of the Oregon Department of Agriculture (ODA) to adequately protect the public health and welfare of local citizens, as well as Oregon's natural resource base for present and future generations by permitting these new facilities. In addition, volunteers submitted comments in opposition to a proposed EPA rule that would exempt the livestock industry from legal public right-to-know requirements related to the reporting of hazardous pollutant emissions, even though these laws are the only way EPA or citizens can find out how much toxic ammonia and hydrogen sulfide is coming out of these operations.

Working with the NEDC committee coordinators on these issues has been the single most rewarding and educational experience for me in law school. In addition to their enthusiasm, they provide the opportunities and guidance that anyone interested in public interest work needs to learn about research and writing before graduating from law school and starting their legal career.

## SUSTAINABLE AGRICULTURE GROUP

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The Sustainable Agriculture project group recently submitted a brief as Amicus Curiae to the 9th Circuit Court of Appeals on behalf of the Arkansas Rice Growers Association. This brief was written in support of plaintiffs, conventional and organic alfalfa farmers and environmental groups, in their case against Monsanto, Forage Genetics International and USDA's APHIS. Plaintiffs had succeeded in District Court, with the Court finding the APHIS failed to comply with NEPA's EIS requirement when it deregulated genetically engineered alfalfa. Plaintiffs succeeded in obtaining an injunction on the planting of genetically engineered alfalfa pending NEPA compliance. Subsequently defendants and interveners appealed this injunction. The brief written by the committee explained to the court how field tests of genetically engineered rice contaminated an enormous portion of the US long grain rice supply, causing one billion dollars in damage to the rice industry.

## NEDC IN THE NEWS

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NEDC's work was the subject of 5 different stories in the Oregonian newspaper over a two-week period last month. Visit [www.nedc.org](http://www.nedc.org) for details, and thanks, as always, for your continued support.

*(Prevention is the Best Medicine...Continued from page 1)*

visible local intersection affected the flow pattern of their stormwater discharge.

NEDC determined that time was of the essence, and so we sent formal notice letters to the owners and operators of those properties notifying them of their liability for Clean Water Act violations. To the credit of those property owners, they hired competent engineering firms that confirmed our allegations, and provided suggestions for immediate and very substantial remedial measures, including moving industrial activity indoors and installing on-site treatment systems to remove pollutants from the stormwater. The City of Portland also instituted a new system of property owner notification to insure this oversight isn't repeated.

Your ongoing support of NEDC's work insures that we can keep adding to the ever-increasing list of success stories like this one. Thanks for your support!

*(Oregon's Chetco River...continued from page 3)*

Thankfully, other federal and state agencies are not jumping on the Corps' bandwagon. From the Clean Water Act, to the National Environmental Policy Act, to the Endangered Species Act, to local land use ordinances, requirements imposed by relevant state and federal laws and regulations require careful evaluation and site-specific limitations on an activity as invasive to the Chetco as gravel mining. These protective provisions are not to be side-stepped in one fell swoop by an agency intent on lessening its paperwork burden. They are essential to protecting the water resources, aquatic and terrestrial species, and riparian vegetation supported by the spectacular Chetco River.

Many thanks to NEDC student volunteer Lizzy Zultoski, and to NEDC's Coastal Law Clerk, Julie Nimnicht, who recently submitted extensive scoping comments to the Corps on behalf of NEDC and numerous other concerned conservation organizations and individuals. We will continue to watchdog this ill-conceived effort by the Corps, and will keep you updated.

## SUPPORT NEDC TODAY!

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American Apparel T-Shirts are complimentary with your generous donation of \$100 or more. T-Shirts are also available for \$14.

**MALE:** Select Blue or Grey in M, L, XL sizes.

**FEMALE:** Select tank-top style in Yellow or Blue in S, M, L sizes. Also available in traditional t-shirt style made of organic cotton in Tan in sizes Sm and Med

**M or F** Style \_\_\_\_\_ Size \_\_\_\_\_ Color \_\_\_\_\_

Please indicate what size, color, and style you would prefer.

# SAVE THE DATE! NEDC CAKEWALK FUNDRAISER

All cakewalk proceeds benefit NEDC's environmental advocacy work. Event limited to 125 guests. Please RSVP by April 4<sup>th</sup>



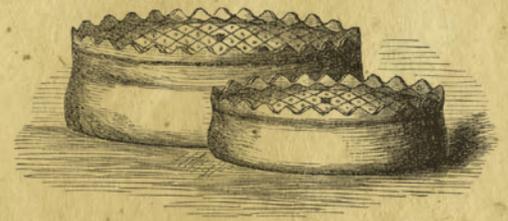
THE EVENT INCLUDES PRIZES, FOOD, DRINKS, AND LIVE MUSIC BY THE PORTLAND BAND, DERBY ([www.derbyrock.com](http://www.derbyrock.com)).

**DATE/TIME:** FRIDAY, APRIL 11, 2008, 7-11 PM  
(KIDS WELCOME UNTIL 10PM)

**LOCATION:** KENNEDY SCHOOL GYM  
5736 NE 33RD AVE, PORTLAND, OR 97211

**ADMISSION:** \$25, \$10 FOR STUDENTS

*Environmental Advocacy is No Cakewalk...  
Except When It Is*



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