

December 19, 2013

Department of the Army
Corps of Engineers, Rock Island District
ATTN: Joe Jordan
Regional Planning and Environmental Division North
Clock Tower Building
P.O. Box 2004
Rock Island IL, 61204-2004


GREAT
RIVERS
Environmental Law Center
Lawyers for the Environment

705 Olive Street
Suite 614
St. Louis, MO 63101-2208
Telephone (314) 231-4181
Facsimile (314) 231-4184
www.greatriverslaw.org

Re: Environmental Assessment, Flanagan South Pipeline Project,
Mississippi River Crossing

Founding President
Lewis C. Green, 1924-2003

The Missouri Coalition for the Environment (MCE) submits these comments on the Environmental Assessment (EA) report prepared by URS Corp. on behalf of Enbridge Pipelines (FSP) L.L.C. dated November 21, 2013, which proposes that the Corps make a Finding of No Significant Impact for the grant of easements over Corps-managed properties at the Mississippi River crossing.

We thank the Corps for the opportunity to comment. We disagree with Enbridge's proposal for the reasons given below. The real project is not one of about 1950 stream crosses along the 600-mile length of the Flanagan South but the entire pipeline project itself, for which a full Environmental Impact Statement is necessary.

MCE is a not-for-profit corporation, qualified to do business in Missouri, with its principal office located in the city of St. Louis. MCE exists for the purposes of promoting clean water, clean air, clean energy, and a healthy environment, and actively advocates for renewable energy and energy efficiency as alternatives to fossil fuels and nuclear power in Missouri.

The EA is untimely.

The EA Report is date November 21, 2013. Enbridge asserts that the drilling must be done in "late fall and winter 2013-2014 and be completed before spring flooding becomes a real risk" (EA § 3.1, p. 7). This means that the Corps properties are likely already occupied and that the project may already have begun and is likely to be well under way before the Corps can issue a FONSI (or, presumably, decline to do so).

40 C.F.R. § 1502.5 says: "An agency shall commence preparation of an environmental impact statement as close as possible to the time the agency is developing or is presented with a proposal (§1508.23) so that preparation can be completed in time for the final statement to be included in any recommendation or report on the proposal. *The statement shall be prepared early enough so that it can serve practically as an important contribution to the decisionmaking process and will not be used to*

PRESIDENT
Kathleen G. Henry
Licensed in MO, IL, DC
GENERAL COUNSEL
Bruce A. Morrison
Licensed in MO, IL
STAFF ATTORNEY
Henry B. Robertson
Licensed in MO
Brook A. Spear
Licensed in MO

BOARD OF DIRECTORS

HONORARY CHAIRMAN
Hon. Thomas F. Eagleton
(1929-2007)
CHAIRMAN, Richard Lageson
Joyce Armstrong
David Bohm
Beatrice Clemens
Kay Drey
Wayne Goode
Louise Green
Roger Hershey
Nancy Kistler
Ron Kucera
Matthew P. McCauley
Ken Midkiff
Cathy Primm
John A. Rava
Thomas Sager
Ben Senturia
James Shrewsbury
James Wilson

ADVISORY LAW COMMITTEE CHAIRMAN, Richard Lageson

Charles Abele
Timothy Barnhart
David Bohm
Richard Constance
Maurice Graham
Elkin Kistner
Hugh Law
Francis Oates
Stephen Reynolds
John Roach
Sharon Turlington
Deborah Wafer
Patricia Wendling
Douglas Williams

rationalize or justify decisions already made (§§1500.2(c), 1501.2, and 1502.2).” (Emphasis added.)

NEPA analysis, including an EA as well as an EIS, must begin at “the earliest possible time” before the agency has made “an irreversible and irretrievable commitment of resources.” *Metcalf v. Daley*, 214 F.3d 1135, 1143 (9th Cir. 2000). The conclusion is that the Corps was predisposed in favor of the project, especially since it already authorized the use of Nationwide Permit 12 in August. The project should therefore be halted and an EIS or new EA conducted. 214 F.3d at 1146.

The project is the pipeline, and an EIS is required.

Enbridge makes clear at the start that this is not about a river crossing but a pipeline. “The FSP [Flanagan South Pipeline] Project is an energy infrastructure project designed to meet the public demand for refined petroleum products in Illinois, the Midwest generally, and across the country” (EA, p. 1). Any given river crossing is only a small part of this project and has no independent utility.

Enbridge also says, “With the No Action Alternative, no pipeline would be constructed” (EA § 2.1). Again, the project is the pipeline.

Seeing the purpose of the project for what it is redefines the scope of the environmental assessment and requires that a full Environmental Impact Statement be done. Without considering the entire pipeline right of way, the effects of the project on endangered and threatened species and on cultural resources and historic properties cannot be meaningfully assessed; nor can the impacts of invasive species (EA, p. 44). The indirect and cumulative effects that must be analyzed under NEPA (some of which are discussed below) expand.

The purpose, need and scope of the project are all defined in terms of the pipeline. Seeing the project for what it is also points out once again the impropriety of using Nationwide Permit 12, which treats each stream crossing as a “separate and complete project” as if the pipeline itself did not exist.

Breaking down the project into separate river crossings also improperly segments or piecemeals the project—that is, it artificially divides a major project into smaller components to escape the application of NEPA. *O’Reilly v. U.S. Army Corps of Engineers*, 477 F.3d 225, 236 (5th Cir. 2007). Treating the project as a myriad of stream crossings, each with minimal environmental impact, obscures the fact that this is a major federal action which requires an EIS.

The Corps’ jurisdiction may be confined to waters of the United States and Corps-managed lands, but the environmental effects of the project are not so confined and must be considered by the Corps.

NEPA requires federal agencies to analyze a project and all of its connected, cumulative, and similar actions together in a single EIS before the project is allowed to proceed. 40 C.F.R. § 1508.25(a). Connected actions are defined as actions that: “(i) Automatically trigger other actions which may require environmental impact statements; (ii) *Cannot or will not proceed unless other actions are taken previously or simultaneously*; or (iii) *Are interdependent parts of a larger action and depend on the larger action for their justification.*” 40 C.F.R. § 1508.25 (a)(1) (emphasis added).

In this case, the entire Flanagan South pipeline is one connected action, and/or all federal approvals of Flanagan South are connected to each other, and to the sections of the pipeline occurring on private land, and must be considered in a single EA or EIS.

Courts employ an “independent utility” test to determine if components of a project are “connected actions.” *Hammond*, 370 F. Supp. 2d at 244 (citing *Coal. on Sensible Transp. Inc. v. Dole*, 826 F.2d 60, 69 (D.C. Cir. 1987)); see also *Wilderness Workshop*, 531 F.3d at 1228–31. The crux of the test is “whether one project will serve a significant purpose even if a second related project is not built.” *Coal. on Sensible Transp.*, 826 F.2d at 69.

In *Hammond*, the court ordered BLM to analyze an entire oil pipeline in a single EIS because it was all one “connected action” and none of the component parts would have independent utility standing alone. *Hammond*, 370 F. Supp. 2d. at 247. In *Thomas v. Peterson*, 753 F.2d at 758, the court held that the construction of a logging road and the sale of the timber in the logging area were connected actions, because “it is clear that the timber sales cannot proceed without the road, and the road would not be built but for the contemplated timber sales.”

The same is true here. Every part of the Flanagan South pipeline, including the segments already approved by the Corps and FWS, the sections requiring easements from the Corps and BIA, and the non-federal portions, are connected actions because none would have independent utility. Individual sections of the pipeline would have no use standing alone. Every part of the pipeline must be connected for the project to serve its purpose of transporting oil from Illinois to Oklahoma, and thus it must all be considered in a single EIS.

Finally, the other parts of pipeline occurring outside of the easements, including the other federal actions approving parts of Flanagan South as well as the non-federal parts of Flanagan South, are “cumulative actions” and/or “similar actions” that must be considered in a single EIS pursuant to 40 C.F.R. § 1508.25(a)(2), (3).

In *Spiller v. Walker*, No. A-98-CA-255-SS, 1998 U.S. Dist. LEXIS 18341, at *40-41 (W. D. Texas, Aug. 25, 1998), the court held that “[t]he Army's role in granting permits for construction over navigable waters and granting a right-of-way over [Army property] combine to have such a crucial impact on the construction of the [pipeline] at so many points along the pipeline that it can only be described as ‘major Federal action.’” Similarly here, the Corps’ role in potentially granting easements, combined with its role in approving over 3 water crossings per mile along the entire pipeline, renders the Corps’ approval of Flanagan South a major federal action.

Furthermore, the Corps must analyze the entire Flanagan South project in a NEPA document because the entire Pipeline is “functionally inseparable” from the portions in Corps jurisdiction. *Mainella*, 459 F. Supp. 2d at 105 (NEPA required National Park Service (“NPS”) to analyze the impacts of a project occurring outside NPS jurisdiction where it was “functionally inseparable” from the NPS-regulated part of the project); *White Tanks Concerned Citizens, Inc. v. Strock*, 563 F.3d 1033, 1040–41 (9th Cir. 2009) (Corps’ NEPA analysis must analyze extra-jurisdictional parts of a project where none of the project could proceed without Corps permits); *Save Our Sonoran, Inc. v. Flowers*, 408 F.3d 1113, 1121-24 (9th Cir. 2005) (Corps’ NEPA analysis was improperly limited to jurisdictional waters that ran through 5% of construction site); *Wyoming Outdoor Council*, 351 F. Supp. 2d at 1242 (Corps was responsible for analyzing uplands impacts of a general §404 permit for oil and gas development because its approval was “essential to completion of the project”) (citing *Utahns for Better Transp. v. U.S. Dept. of Transp.*, 305 F.3d 1173 (10th Cir. 2002) (NEPA required where water crossings were “so interdependent that it would be unwise or irrational” to complete the project without a discharge permit.)). Therefore, the law is clear: the Corps cannot limit its NEPA analysis to the easements;

rather, it must analyze the impacts of the entire Pipeline, including discharges into U.S. waters, other federally-approved sections, and all “non-federal” sections.

The Corps must analyze the environmental effects of the pipeline.

The Corps has the obligation under NEPA to assess the direct, indirect and cumulative impacts of the project. It has further obligations to protect environmental resources under Executive Orders 11990 (wetlands), 11988 (floodplains); and 13112 (invasive species). It has obligations under the Clean Air Act, Clean Water Act and other federal statutes listed in the EA, §9.0. In granting easements, the Corps must determine whether they are compatible with the public interest. 33 CFR § 211.6(b).

As Enbridge defines the project (and its purpose, need and scope), it is to build a pipeline that will transport diluted bitumen (dilbit) from the Alberta tar sands, as well as shale oil from North Dakota, to American refineries. The effects of the project are so detrimental that they are not in the public interest and threaten the integrity of the natural and human environment for present and future generations.

Climate change

Utilizing tar sands oil results in much greater greenhouse gas emissions and climate impacts than conventional crude oil. There are two primary reasons for these increased climate impacts: (1) the heaviness and viscosity of tar sands oil requires more energy and resource-intensity for extraction, and (2) its chemical composition requires more refining to yield consumable fuels.

Accordingly, the greenhouse gas emissions from tar sands oil are up to 111 percent greater than the average crude oil refined in the U.S., on a well-to-tank basis; and up to twenty percent greater on a well-to-wheel basis.¹

Unlike conventional crude, bitumen must be mined or extracted in-situ.² Tar sands strip mining occurs when the bitumen deposits are less than about 75 meters below the surface.³ In-situ methods are used for deeper deposits and use steam injections to liquefy the bitumen, allowing it to flow out of the reservoir.⁴ These extraction techniques are very energy intensive and are a significant part of the reason why tar sands oil produces so much more greenhouse gas emissions than conventional crude.

The Intergovernmental Panel on Climate Change, in its recently-released Fourth Assessment Report, sets a global “carbon budget” that we are rapidly exhausting by continued emissions of greenhouse gases.⁵ If we are to avoid dangerous climate change, carbon-intensive

¹ Congressional Research Service, *Oil Sands and the Keystone XL Pipeline: Background and Selected Environmental Issues* 25 (Jul. 16, 2012), available at <http://www.fas.org/sgp/crs/misc/R42611.pdf>. Well-to-wheel accounts for fuel combustion.

² NATURAL RESOURCES DEFENSE COUNCIL, *TAR SANDS PIPELINES SAFETY RISKS* [hereinafter NRDC REPORT] note 6, at 5 (Feb. 2011), available at <http://www.nrdc.org/energy/files/tarsandssafetyrisks.pdf>.

³ CONGRESSIONAL RESEARCH SERVICE, *CANADIAN OIL SANDS: LIFE-CYCLE ASSESSMENTS OF GREENHOUSE GAS EMISSIONS* 4 (June 2012), available at <http://www.fas.org/sgp/crs/misc/R42537.pdf>.

⁴ *Id.*

⁵ <http://www.theguardian.com/environment/2013/sep/29/carbon-budget-talks-urgent-ipcc-lord-stern>

fuels like tar sands oil must be left mostly in the ground. Since the avowed purpose of the Flanagan South and other tar sands pipelines is to increase the production and consumption of tar sands oil, climate change is an environmental effect of this project that militates against its approval.

Risk of dilbit spills

The EA, in § 5.11.2 on “Operation and Maintenance Releases,” refers to the Transportation Research Board’s report on the effects of dilbit on pipelines and includes a table from PHMSA on pipeline incidents from 2008–2010 (EA, pp. 58–9). But the TRB did not address dilbit *spills* from pipelines, and Enbridge does not cite any dilbit spills specifically except for one passing reference to “the Line 6B Marshall incident” (p. 66), which was a major spill into the Kalamazoo River in Michigan in 2010. That, and a spill in Mayflower, AR in 2013 from the ExxonMobil Pegasus line, demonstrate that dilbit is different from crude oil.

Bitumen cannot be shipped by pipe in raw form. To be shipped, it must either be refined down to a substance resembling conventional crude or be diluted with chemicals in order for it to flow to upgrading and refining facilities through a pipe.⁶ Diluted bitumen is often referred to as “heavy crude,” but it differs substantially from many other “heavy crudes” because it must be shipped with diluents.

In contrast, conventional crude is a liquid fuel source that flows readily. As Nancy Kinner, a civil and environmental engineering professor at the University of New Hampshire and co-director of the Coastal Response and Research Center who researches submerged oil has stated: “[O]ne would not consider tar sands typical crude oil...It’s not considered crude oil by most people who deal with oil and oil spills.”⁷ The higher acid number, viscosity, sulfur levels, heavy metal content, quantity of abrasives, and proprietary blend of diluents all make tar sands oil a significantly different product than conventional crude. It must be treated differently.

The density, viscosity, higher acid number, and toxicity of tar sands oil make it substantially more damaging and difficult to contain and respond to when it is released into the environment.

The chemical composition of diluted bitumen impacts how it behaves once spilled. While every type of crude oil is composed of hundreds of chemical compounds ranging from light to heavy, the vast majority of chemicals in conventional oils are in the middle of the range.⁸ However, diluted bitumen has very few mid-range compounds. Instead, it is composed of very light diluents and very heavy bitumen.⁹ “Because bitumen makes up 50 to 70 percent of the composition of dilbit, at least 50 percent of the compounds in dilbit are likely to sink in water, compared with less than 10 percent for most conventional crude oils,” a difference that is critical

⁶ NRDC REPORT, *supra* note 6, at 5.

⁷ Lisa Song, *A Dilbit Primer: How It’s Different from Conventional Oil*, INSIDE CLIMATE NEWS, June 26, 2012 [hereinafter *A Dilbit Primer*], available at <http://insideclimatenews.org/news/20120626/dilbit-primer-diluted-bitumen-conventional-oil-tar-sands-Alberta-Kalamazoo-Keystone-XL-Enbridge>.

⁸ Lisa Song, *Is Dilbit Oil? Congress and the IRS Say No*, TRUTHOUT, Aug. 4, 2012, available at <http://truth-out.org/news/item/10693-is-dilbit-oil-congress-and-the-irs-say-no>.

⁹ *Id.*

in the context of spill response.¹⁰ In short, diluted bitumen sinks when it is spilled making response extremely challenging and resource intensive.

Conventional crude oil can be contained, skimmed, absorbed, or consumed because it typically floats on water.¹¹ Because tar sands oil is so much heavier, much of it sinks and sticks to the substrate.¹² Moreover, heavy oil exposed to sunlight forms an even stickier substance that is difficult to remove from rocks and sediment.¹³ In addition, the various toxic substances in tar sands oil bioaccumulate in humans and wildlife, so their harmful impacts continue with time.¹⁴

The substantially greater impacts of tar sands oil on the environment are illustrated by the Kalamazoo River spill.¹⁵ The heavy bitumen sank to the river bottom, coating wildlife, rocks and sediment.¹⁶

In addition, diluted bitumen contains significant quantities of toxins. Oil giant Imperial Oil has reported that diluted bitumen contains a variety of toxins including hydrogen sulfide, benzene, and polynuclear aromatic hydrocarbons.¹⁷ These chemical compounds can cause a variety of significant human health problems including, but not limited to, breathing difficulty, dizziness, damage to the central nervous system, coma, cancer, and death.¹⁸ According to Environment Canada, the chief Canadian federal environmental regulatory arm, diluted bitumen also contains toxic compounds such as arsenic, nickel, and vanadium¹⁹ in larger quantities than what is found in conventional crude.²⁰ These heavy metals do not biodegrade and accumulate in the environment, becoming an ongoing threat to the health of people and wildlife long after their initial toxic impacts are felt.²¹

The tragic consequences of the Kalamazoo spill were detailed in a July 2012 report by the National Transportation Safety Board (NTSB).²² The report was highly critical of Enbridge, the pipeline operator, and the existing federal regulatory framework. The NTSB found that, “Pervasive organizational failures by a pipeline operator along with weak federal regulations led

¹⁰ *Id.*

¹¹ *How do you clean up an oil spill?*, University of Delaware Sea Grant Program (2004), <http://www.ceoe.udel.edu/oilspill/cleanup.html>.

¹² *Tar Sands Oil Spill in Kalamazoo River in Michigan the Most Expensive Onshore Oil Spill in History*, Motley News and Photos (July 11, 2012), <http://motleynews.net/2012/07/11/tar-sands-oil-spill-in-kalamazoo-river-in-michigan-the-most-expensive-onshore-oil-spill-in-history>.

¹³ NRDC REPORT, *supra* note 6, at 7.

¹⁴ *Canada's Tar Sands*, Nature Canada, http://www.naturecanada.ca/tarsands_habitat.asp (last visited Jan. 24, 2013).

¹⁵ Environmental Protection Agency, Region V, *Pollution/Situation Report #I66 8* (Oct. 29, 2012), available at http://www.EPA.gov/enbridgespill/pdfs/sitreps/20121025_sitrep_166.pdf.

¹⁶ NTSB REPORT; David Sassoon, *Crude, Dirty and Dangerous*, N.Y. Times (Aug. 20 2012), available at http://www.nytimes.com/2012/08/21/opinion/the-dangers-of-diluted-bitumen-oil.html?_r=0.

¹⁷ Imperial Oil, Material Safety Data Sheet: DilBit Cold Lake Blend (2002), available at http://www.msdsxchange.com/english/show_msds.cfm?paramid1=2479752.

¹⁸ *Id.*

¹⁹ Environment Canada, Athabasca Bitumen, available at http://www.etc-cte.ec.gc.ca/databases/OilProperties/pdf/WEB_Athabasca_Bitumen.pdf.

²⁰ NRDC REPORT, *supra* note 6, at 7.

²¹ *Id.*

²² U.S. DEPT. OF STATE, DRAFT EIS, KEYSTONE XL PROJECT, APP. Q. PIPELINE RISK ASSESSMENT AND ENVIRONMENTAL CONSEQUENCE ANALYSIS, at 4-9 to -10 (Mar. 2013)

to a pipeline rupture and subsequent oil spill in 2010... This accident is a wake-up call to the industry, the regulator, and the public.”²³

Effects on endangered species

The Fish and Wildlife Service issued a Biological Opinion (“BIOP”) and Incidental Take Statement (“ITS”) for Flanagan South, authorizing Enbridge to “take” two threatened and endangered species in connection with the construction and operation of the pipeline: the Indiana bat (*Myotis sodalis*) and the American burying beetle (*Nicrophorus americanus*).

The Service’s BIOP applies to the entire pipeline. The Service’s BiOp states: “[T]he Federal actions will result in the construction, operation, and maintenance of the FS Pipeline. Although the Corps and BIA each have their own permit and easement areas (described above), the construction, maintenance, and operation of the pipeline will result in direct effects and indirect effects throughout the entire pipeline. Therefore, the Action Area for this consultation is the entire 593 mile length of the FS Pipeline, including the permanent right-of-way (ROW), temporary ROW, extra temporary work spaces, access roads, pipe yards, aboveground facilities (e.g. mainline valves and pump stations), contractor yards, and a buffer distance of 3,280 feet (ft) [1 kilometer (km)] around all of these areas.” Ex. H at 12. (Emphasis added.)

The Corps must therefore consider the impacts to these species in its NEPA analysis. *In re Consolidated Salmonid Cases*, 688 F. Supp. 2d 1013, 1025 (E.D. Cal 2010) held that the Bureau of Reclamation’s (Reclamation) implementation of a biological opinion issued by the National Marine Fisheries Service (NMFS) was a major federal action pursuant to 40 C.F.R. § 1508.18. The court reasoned that because the ESA regulations gave Reclamation the discretion to determine “whether and in what manner to proceed with the action” in light of the Biological Opinion, its decision to move forward with the project and implement the BO was a major federal action triggering NEPA. *Id.* at 1022 (quoting 50 C.F.R. § 402.15(a)); see also *San Luis & Delta-Mendota Water Auth. v. Salazar*, 686 F. Supp. 2d 1026, 1049 (E.D. Cal. 2009) (“Reclamation’s implementation of the BiOp is major federal action”); *Fund for Animals, Inc. v. Rice*, 85 F.3d 535, 546-47 (11th Cir. 1996) (Corps complied with NEPA in issuing a §404 permit for a landfill that required FWS to issue an ITS).

The Corps must consider the contingency plan to HDD.

The proposed Action is described in § 3 of the EA as two options for horizontal directional drilling (HDD) under the river. However, in a letter of Aug. 23, 2012 from Ron Fuchs of Enbridge to Earl W. Wood, Realty Specialist at the Rock Island District (attached), Enbridge acknowledges that HDD may prove impracticable (letter, p. 2). In that case, Enbridge proposes “Contingency Plans for Installation.” The EA makes no mention of these plans. They include (letter, p. 3): “The work within the Mississippi River will consist of excavating by use of a hydraulic dredge. A trench of approximately 10’ bottom width, with 4-to-1 side slopes and depth in excess of the existing and operating Spearhead line will be made. The excavated trench material will be disposed of at an approved site. Sand and gravel will be used for backfilling.”

²³ Press Release, National Transportation Safety Board, *Pipeline Rupture and Oil Spill Accident Caused by Organizational Failures and Weak Regulations* [hereinafter NTSB Press Release] (July 10, 2010), available at <http://www.nts.gov/news/2012/120710.html>.

The environmental effects of this method will obviously be greater than those of HDD under the river. For example, the EA, § 5.5.2, states: “Based on habitat requirements, it is likely that fish species of concern are limited to habitats that would be crossed using HDD.” This is no longer a valid assessment in the event that the trench method is used instead of HDD. The EA, § 5.5.3, reaches the same conclusion with regard to freshwater mussels. Enbridge says, “The mussel shells observed at the Mississippi River crossing...were not classified to distinguish their particular species, given that it is Enbridge’s intent to cross this waterbody via the HDD method” (EA, § 4.5.1.3). Such species classification needs to be done in order to evaluate the effects of the contingency plan.

High Consequence Area

The EA Report (pp. 62–4) cites PHMSA regulations regarding High Consequence Areas (HCAs). But the report stops short of saying that the Mississippi River is an HCA or that Enbridge will comply with the regulations, specifically 49 CFR 195.452; it only says that it “*would* comply.”

This river crossing most certainly is an HCA if only because the Mississippi is a “commercially navigable waterway,” 49 CFR 195.450. The Corps should make the finding that it is an HCA and secure a commitment from Enbridge to follow the regulations in 49 CFR 195.452.

The unit of integrity management is the entire pipeline. 49 CFR 195.452(a). The integrity management plan must address “the risks on each segment of pipeline.” 49 CFR 195.452(b)(1). The operator must prioritize[] pipeline segments for assessment,” 49 CFR 195.452(e), identify “which pipeline segments could affect a high consequence area,” 49 CFR 195.452(f)(1), and analyze “the integrity of the entire pipeline and the consequences of a failure,” 49 CFR 195.452(g). The scope of these rules dictates once again that the project is the pipeline, and a full EIS should be prepared.

Thank you for considering these comments.



Henry Robertson, # 29502
Great Rivers Environmental Law Center
705 Olive Street, Ste. 614
St. Louis, MO 63101-2208
(314) 231-4181 (T)
(314) 231-4184 (F)
hrobertson@greatriverslaw.org

*Attorney for
Missouri Coalition for the Environment*