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Via Email and Federal Express

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***Sixty-Day Notice of Intent to Sue for Endangered Species Act Violations
Related to the Withdrawal of the Proposed ESA Listing for the
Bi-State Distinct Population Segment of Greater Sage-Grouse***

Dear Secretary Bernhardt and Director Skipwith:

This letter serves as sixty-day notice on behalf of the Center for Biological Diversity, Desert Survivors, Western Watersheds Project, and WildEarth Guardians (collectively, “Conservation Groups”) of their intent to sue the U.S. Fish and Wildlife Service (“Service”) for violations of Section 4 of the Endangered Species Act (“ESA”), 16 U.S.C. § 1533, and Section 706(2) of the APA, 5 U.S.C. § 706(2), in its determination to withdraw the proposed ESA listing rule for the Bi-State Distinct Population Segment of Greater Sage-Grouse (“Bi-State Sage-Grouse”). *See* 85 Fed. Reg. 18,054 (Mar. 31, 2020) (“2020 Withdrawal”).

I. Background and status of the Bi-Stage Sage-Grouse

The Bi-State Sage-Grouse is a genetically distinct population segment of the greater sage-grouse, a large, ground-dwelling bird that relies on the deeply threatened and ever-shrinking sagebrush-steppe and meadow habitats scattered throughout the Intermountain West.

The Bi-State Sage-Grouse lives at the far southwestern reaches of the species’ range in the unique habitats that straddle the border between California and Nevada. The population segment is divided into six increasingly isolated population management units (“PMUs”): Pine Nut, Desert Creek–Fales, Mount Grant, Bodie, South Mono, and White Mountains. U.S. Fish & Wildlife Service, Species Report: Bi-State Distinct Population Segment of Greater Sage-Grouse 5, 18-33 (Jan. 17, 2020) (“2020 Species Report”).

The Service estimates that the Bi-State Sage-Grouse's population and range have both been cut in half during the last 150 years. 2020 Species Report at 5, 18. The number of active mating sites, known as leks, has fallen from an estimated 122 to approximately 50, *see id.* at 23, and the Service now estimates that the total Bi-State Sage-Grouse population is 3,305, *see* 85 Fed. Reg. at 80,080.

The Service explains that an “effective population size” of at least 500 breeding birds, and perhaps up to 5,000 breeding birds, is required to maintain the evolutionary potential of the sage-grouse. 2020 Species Report at 118. Even to support the very low end of that estimate, 5,000 *individual* birds are likely needed. *Id.* at 119. But the Bi-State Sage-Grouse population does not have 5,000 individuals, *see* 85 Fed. Reg. at 80,080, and the Service itself estimates that the effective population size of the entire range is as low as 330 birds. 2020 Species Report at 120. Indeed, even that figure does not account for the isolated nature of the individual populations in the Bi-State Sage-Grouse range. In fact, two PMUs have estimated effective populations of *fewer than ten* individuals each. *Id.* The estimate for another PMU is as low as 81. *Id.*

II. Overview of the ESA framework

Congress enacted the ESA to address precisely such a dire situation as this one. The statute provides a comprehensive scheme for protecting and conserving imperiled species, their habitat, and the ecosystems upon which they depend. As the Supreme Court has explained, the “plain intent” of Congress—reflected in “literally every section of the statute”—was “to halt and reverse the trend toward species extinction, whatever the cost.” *Babbitt v. Sweet Home Chapter of Cmty. for a Great Or.*, 515 U.S. 687, 699 (1995).

As relevant here, Section 4 of the ESA establishes a listing process to identify species or distinct population segments that are “endangered” or “threatened” with extinction, to designate critical habitat for those species, and to develop plans to recover imperiled species. *See* 16 U.S.C. § 1533. The ESA defines “endangered species” to mean “any species which is in danger of extinction throughout all or a significant portion of its range,” *id.* § 1532(6), and “threatened species” to mean “any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range,” *id.* § 1532(20).

The ESA does not itself define the term “significant portion of its range.” To that end, the Service promulgated an interpretive rule in 2014. *See* 79 Fed. Reg. 37,578 (July 1, 2014) (“SPR Policy”). Under this original SPR Policy, “[a] portion of the range of a species is ‘significant’ if the species is not currently endangered or threatened throughout its range, but the portion’s contribution to the viability of the species is so important that, without the members in that portion, the species would be in danger of extinction, or likely to become so in the foreseeable future, throughout all of its range.” *Id.* at 37,609.

At least two courts held unlawful the SPR Policy’s definition of “significant portion” because it collapsed the SPR analysis into the analysis for the species as a whole throughout all of its range. *See Desert Survivors v. U.S. Dep’t of the Interior*, 321 F. Supp. 3d 1011, 1068-74 (N.D. Cal. 2018); *Ctr. for Biological Diversity v. Jewell*, 248 F. Supp. 3d 946, 955-58 (D. Ariz.

2017). The definition was vacated nationwide in 2018. *See Desert Survivors v. U.S. Dep't of the Interior*, 336 F. Supp. 3d 1131, 1133, 1137 (N.D. Cal. 2018).

The Service has not repealed or replaced the invalid portions of the SPR Policy, but in 2017 (before the *Desert Survivors* vacatur) it issued additional guidance for applying the SPR Policy. *See* Memorandum from the Dir., U.S. Fish & Wildlife Service, to Regional Dirs., U.S. Fish & Wildlife Service, Doc. FWS/AES/DCC/063503 (Jan. 19, 2017) (“SPR Letter”). The SPR Letter establishes a stepwise process for making “significance” determinations but does not provide a new definition of the term “significant” to replace the vacated definition. *Id.*

When the Service decides whether to list a species as endangered or threatened under the ESA, it must determine whether the species is facing extinction due to “(A) the present or threatened destruction, modification, or curtailment of its habitat or range; (B) overutilization for commercial, recreational, scientific, or educational purposes; (C) disease or predation; (D) the inadequacy of existing regulatory mechanisms; or (E) other natural or manmade factors affecting its continued existence.” 16 U.S.C. § 1533(a)(1). Importantly, the Service must examine these factors “solely on the basis of the best scientific and commercial data available.” *Id.* § 1533(b)(1)(A).

When the Service makes listing determinations, it assesses conservation efforts under its Policy for Evaluation of Conservation Efforts When Making Listing Decisions, 68 Fed. Reg. 15,100 (Mar. 28, 2003) (“PECE Policy”). The PECE Policy enables the Service to evaluate whether federal, state, or private conservation efforts “contribute to making it unnecessary to list a species, or to list a species as threatened rather than endangered.” *Id.* at 15,113. The Service can rely on unproven or speculative conservation efforts only if it finds that the measures are sufficiently certain to be implemented and certain to be effective. *Id.* at 15,114-15. The PECE Policy provides nine criteria for evaluating the prospect of implementation and six for the degree of effectiveness.

III. Legal and administrative precursors to the 2020 Withdrawal

The 2020 Withdrawal is only the latest episode in a long and cyclical story about the imperiled Bi-State Sage-Grouse and the persistent effort to forestall its increasingly conspicuous decline. *See Desert Survivors*, 321 F. Supp. 3d at 1023-36 (describing population decline, conservation efforts, and previous administrative actions); *see also* 85 Fed. Reg. at 18,055 (describing the vacatur of the Service’s previous withdrawal decision).

In 2001 and 2005, two sets of environmental groups petitioned the Service to list the Bi-State Sage-Grouse (then known as the Mono Basin population) under the ESA. *Desert Survivors*, 321 F. Supp. 3d at 1025. The Service rejected each of those petitions. *Id.* In response, the 2001 petitioners filed suit and the 2005 petitioners sent a sixty-day notice of intent. *Id.* The Service settled both actions in 2006, in part by agreeing to issue new findings. *Id.* It did so later that year, once again declining to list the Bi-State Sage-Grouse. *Id.* In response, the Service was sued yet again, and it signed yet another settlement agreement committing it to issue new findings. *Id.* at 1025-26. Eventually, in 2010, the Service announced that listing the Bi-State Sage-Grouse was warranted but precluded by higher priority actions. *Id.* at 1026. The following year the Service

entered into a settlement agreement in a consolidated case, agreeing to issue proposed listing rules or not-warranted findings for numerous species, including the Bi-State Sage-Grouse. *Id.*

In 2013, the Service issued a proposed rule to list the Bi-State Sage-Grouse as threatened and to designate critical habitat for the population segment. 78 Fed. Reg. 64,358 (“2013 Proposal”). The 2013 Proposal identified multiple impacts of “high current or future scope and severity” that created “the present or threatened destruction, modification, or curtailment of its habitat or range, and other natural or manmade threats affecting the [Bi-State Sage Grouse’s] continued existence.” *Id.* at 64,364. And it asserted, in no uncertain terms, that “the Bi-State [Sage-Grouse] is likely to become endangered within the foreseeable future throughout all or a portion of its range” based on numerous synergistic threats, including infrastructure, livestock grazing, wildfires, and nonnative and invasive plants. *Id.* at 64,374-75.

In 2015, the Service reversed course and withdrew the 2013 Proposal. *See* 80 Fed. Reg. 22,828 (Apr. 23, 2015) (“2015 Withdrawal”). In doing so, it relied heavily on the promise of the conservation measures that were described in the 2012 Bi-State Action Plan, *id.* at 22,849, even though that document already existed when the 2013 Proposal was issued, *see, e.g.*, 78 Fed. Reg. at 68,359. The Service also cited new modeling that it interpreted to mean the Bi-State Sage-Grouse population was stable. *See, e.g.*, 80 Fed. Reg. at 22,853.

Shortly thereafter, the Conservation Groups filed suit against the Service in the Northern District of California, alleging that the Service’s withdrawal violated the ESA and APA. *See* Complaint for Declaratory and Injunctive Relief, *Desert Survivors*, 321 F. Supp. 3d 1011 (N.D. Cal. 2018) (No. 3:16-cv-01165-JCS). In 2018, the court agreed with the Conservation Groups and granted summary judgment in their favor. *Desert Survivors*, 321 F. Supp. 3d at 1076. It held, among other things, that the Service’s reliance on the new population modeling contradicted its own admissions that the results had to be interpreted “with caution,” *id.* at 1045; that the Service’s PECE analysis failed to provide fundamental details about the effects of conservation efforts, like pinyon-juniper and cheatgrass removal, on Bi-State Sage-Grouse, *id.* at 1061-66; that the SPR Policy’s definition of “significant” was impermissibly restrictive on its face, *id.* at 1070-74; and that, even if the definition were valid, the Service’s SPR analysis relied on faulty PECE analysis that didn’t provide enough detail about specific PMUs, *id.* at 1074-76.

The court vacated the 2015 Withdrawal, reinstated the 2013 Proposal, ordered a new public comment period, and vacated the definition of “significant” in the SPR Policy. *Desert Survivors*, 336 F. Supp. 3d at 1133, 1137. In April of 2019, the Service announced the reinstatement of the proposed rule and the reopening of public comment. 84 Fed. Reg. 14,909 (Apr. 12, 2019). In October, it announced a six-month extension of its final listing determination. 84 Fed. Reg. 52,058 (Oct. 1, 2019). Finally, in March 2020, after providing the additional, court-ordered public comment period, and in the face of overwhelming evidence of the Bi-State Sage-Grouse’s continued decline, the Service again withdrew the 2013 Proposal. *See* 85 Fed. Reg. at 18,084, 18,099.

IV. Legal violations in the 2020 Withdrawal

While the Service corrected some of the most egregious errors it committed the last round, the 2020 Withdrawal again violates Section 4 of the ESA, the Service's PECE Policy, and the principles of the 2018 court decision, and it is arbitrary and capricious under the Administrative Procedure Act ("APA").

A. The Service continues to misrepresent the perilous status of the Bi-State Sage-Grouse and the threats the population faces.

In the 2020 Withdrawal, the Service has misapplied the ESA's listing factors, departed from the best available science, relied on unproven and speculative conservation measures, and drawn unreasonable conclusions from the evidence in front of it. The following errors, among others, render it unlawful under Section 4 of the ESA and Section 706(2) of the APA.

As a general matter, the 2020 Withdrawal relies on findings in the 2020 Species Report as well as a recently released study, Peter S. Coates et al., U.S. Geological Survey, Open-File Report 2019-1149, Population and Habitat Analyses for Greater Sage-Grouse (*Centrocercus urophasianus*) in the Bi-State Distinct Population Segment: 2018 Update (2020) ("2020 Coates Study"). But the Service improperly interprets the 2020 Coates Study, cherry-picks from its findings to reach a predetermined conclusion, and fails to address the data limitations that undermine its trends analysis and the 2020 Species Report's trends analysis.

- The Service improperly interprets the model results from the 2020 Coates Study, which clearly shows that the Bi-State Sage-Grouse population and its PMU populations sit well below sustainable population levels and continue to spiral downward. The report describes a 15.7% range-wide population decline over the last 18 years and a 9.6% decline over the past 11 years, and it indicates that the previous six years saw particularly substantial losses. Only one PMU, Bodie, grew between 2001 and 2018 *or* between 2008 and 2018, and even then it grew only marginally. This well-documented, long-term population decline provides ample evidence that the species is threatened with extirpation throughout its range despite past and ongoing conservation measures.
- The Service overlooks the Bi-State Sage-Grouse's substantial range contraction. The 2020 Coates Study describes a median annual loss in distributional area of 2,312 hectares from 2008 to 2018, which corresponds to a total loss of 55,492 hectares (15%). Once again, Bodie is the sole subpopulation that has experienced marginal gains in this respect. As the 2020 Coates Study explains, "core [annual distribution areas] existing in peripheral subpopulations of Pine Nuts, Desert Creek, Fales, Sagehen, and White Mountains during 2008 became functionally absent as of 2018." The Service brushes away these trends despite the 2020 Coates Study's cautioning that they could "could have meaningful impacts on overall metapopulation persistence."
- The Service relies disproportionately on the prospects of a single PMU, Bodie, to sustain its conclusion that the Bi-State Sage-Grouse is not threatened or endangered in all or a significant portion of its range. But Bodie is not a representative population. For example,

it sits at a higher elevation, has better sagebrush cover, experiences more precipitation, and is more effectively buffered against droughts. And the Service does not adequately consider or analyze the possibility that the other five PMUs, or some combination of them, represent a significant portion of the range. Moreover, the Service uses the relative success of Bodie to misrepresent the threat that livestock grazing poses to the Bi-State Sage-Grouse. Bodie's unique traits allow it to perform adequately *despite* the livestock grazing that continues to threaten the rest of the Bi-State Sage-Grouse range.

- As explained above, the Service ignores or misconstrues the aspects of the 2020 Coates Study that undermine the Service's conclusions. But even to the degree that the Service interprets the results of the 2020 Coates Study reasonably, the study itself suffers from substantial methodological limitations that are likely to systematically understate the threats faced by the Bi-State Sage-Grouse. For example, the study's models rest on incomplete data: For a number of subpopulations, such as White Mountains, there was insufficient data to estimate population trends since 1995 or since 2001. Long-term trends are therefore biased in favor of relatively well-performing PMUs like Bodie. Additionally, the 2020 Coates Study's models do not account for habitat parameters such as height, forb diversity, and other field measurements of range quality. These factors may help distinguish between better- and worse-performing areas of the Bi-State Sage-Grouse range and may help illustrate, among other things, the continued effects of livestock grazing.

B. The PECE analysis remains inadequate.

Planned and ongoing conservation efforts represent a linchpin of the 2020 Withdrawal, but the Service misapplied the PECE Policy's criteria in concluding that the 2012 Bi-State Action Plan's conservation measures are certain to be effective.

This is a repeat error. After reviewing the 2015 Withdrawal, the court in *Desert Survivors* declared that “the Service's PECE analysis is arbitrary and capricious because it does not offer any basis for concluding that the conservation efforts described in the 2012 BSAP are sufficiently certain to be effective.” 321 F. Supp. 3d at 1065-66.

Given that strong reprimand, it is particularly surprising how little the Service has decided to change in the 2020 Withdrawal. *See* U.S. Fish & Wildlife Serv., PECE Evaluation for the Bi-State Distinct Population Segment of Greater Sage-Grouse 2012 Bi-State Action Plan (BSAP), <https://www.regulations.gov/document?D=FWS-R8-ES-2018-0107-0094> (“2020 PECE Analysis”); *see also* U.S. Fish & Wildlife Serv., PECE Evaluation for the Bi-State Distinct Population Segment of Greater Sage-Grouse 2012 Bi-State Action Plan (BSAP), <https://www.regulations.gov/document?D=FWS-R8-ES-2013-0072-0302> (“2015 PECE Analysis”).

To be sure, the Service has updated some minor aspects of its analysis. *Compare, e.g.*, 2015 PECE Analysis at 38 (describing priority sites for conservation easements), *with* 2020 PECE Analysis (describing easements that have since been secured). And at times the analysis speaks in great detail about what conservation activities are planned, who will undertake them, and when they will occur. But the 2020 PECE Analysis does nothing to fulfill the fundamental requirements the court identified in 2018: providing detail about (1) the “magnitude of the

impact on the species that the measures can be expected to achieve,” and (2) the “estimated length of time that it will take for a formalized conservation effort to produce a positive effect on the species.” *See Desert Survivors*, 321 F. Supp. 3d at 1065. It is also true that the voluntary conservation measures upon which the Service relies only benefit a small proportion of the key sage-grouse habitats which the Service designated as proposed Critical Habitat in its 2013 Proposed Rule.

The Service fails to explain how particular conservation measures will actually affect Bi-State Sage-Grouse on the ground. This is especially true for pinyon-juniper and cheatgrass removal, the two interventions that the 2018 court decision chiefly addressed. Although the Service has provided new scientific evidence to support its findings, those studies were either not set in the Bi-State Sage-Grouse range or else relied heavily on simulations and projections rather than field observations or telemetering. And what’s more, the 2020 PECE analysis continues to speak broadly about the Bi-State Sage-Grouse as a whole rather than about particular PMUs. As the 2018 court decision explained, that renders the 2020 PECE Analysis an inadequate basis for the Service’s SPR analysis, discussed below.

C. The Service’s SPR analysis is unlawful.

The court spoke clearly when it invalidated the SPR Policy’s definition of “significant” in 2018. Under the Service’s interpretation, no species could be deemed endangered or threatened in a significant portion of its range if it did not already qualify as endangered throughout *all* of its range. Because this construction rendered “illusory” any distinction between the two different pathways to ESA protection, it was invalid on its face. *Desert Survivors*, 321 F. Supp. 3d at 1072. The court vacated the definition nationwide. *Desert Survivors*, 336 F. Supp. 3d at 1133, 1137.

The Service has not adequately corrected the definitional error, despite its insistence that “[w]e have completed our SPR analysis for the Bi-State DPS in accordance with the [SPR Policy] and the [SPR Letter] as further refined by applicable court decisions.” *See* 85 Fed. Reg. at 18,056. For one, the Service acted arbitrarily and capriciously in articulating its new definition of “significant.” After conceding that the *Desert Survivors* decision invalidated its previous definition, the Service says that it now “screen[s] for significant portions of the range by applying *any reasonable definition* of ‘significant.’” 85 Fed. Reg. at 18,098 (emphasis added). Then, without citing sources or providing additional details, the Service notes that “[b]iological importance/significance is often considered in terms of resiliency, redundancy, or representation.” *Id.*

Such conclusory statements do not satisfy the basic requirements of clear, reasoned administrative decisionmaking—especially where, as here, the very scope of the ESA’s protections turns on the definition at issue. The Service must articulate a cogent, not merely commonsensical, basis for its definition of “significant,” and that definition must include actual metrics or reference points of some kind.

Even if “resiliency, redundancy, [and] representation” are facially appropriate factors in determining the significance of a portion of a species’ range, the Service’s application of these factors to the Bi-State Sage-Grouse violates the ESA. In the Service’s analysis, the standard for

significance is once again “functionally equivalent to the threshold under the ‘throughout all’ definition” that the court previously held was invalid. *See Desert Survivors*, 321 F. Supp. 3d at 1070-71. The Service does not ask whether any portion of the Bi-State Sage-Grouse range is significant on its own terms. As to the genetic uniqueness of the Pine Nut and White Mountains PMUs, for example, the Service asks only whether the loss of one of these PMUs would, by itself, deprive the “remainder” of the range of some “unique or significant adaptive capacity.” 85 Fed. Reg. at 18,098. That formulation conflates the part and the whole in violation of the previous court decision and FWS’s application of the SPR Letter stepwise process results in the same error as its earlier reliance on the SPR Policy. The Service’s SPR analysis is unlawful because it excludes the possibility that a significant portion of the Bi-State Sage-Grouse range—but not all of the range—will be found threatened or endangered.

Additionally, the Service’s analysis incorrectly and unreasonably assumes that the individual PMUs, each taken in isolation, represent the correct units for conducting its SPR analysis. But *every* PMU except for Bodie shrunk between 2001 and 2018 *and* between 2008 and 2018. A proper SPR analysis would therefore ask whether various *combinations* of those PMUs or their subpopulations represent “significant portions” of the range. The Service’s analysis avoids this and other critical questions that would reveal the continuing decline of the Bi-State Sage-Grouse, thereby allowing the Service to reach erroneous, unlawful conclusions.

V. Parties giving notice

The Center for Biological Diversity (“Center”) is a California nonprofit organization dedicated to the preservation, protection, and restoration of biodiversity, native species, and ecosystems. The Center was founded in 1989 and is headquartered in Tucson, Arizona, with offices throughout the country, including California and Nevada. The Center has approximately 70,000 members, including many who reside in, explore, and enjoy the native species and ecosystems of California and Nevada where the Bi-State Sage-Grouse is located. The Center’s contact information is as follows: Center for Biological Diversity, 1212 Broadway, Suite 800, Oakland, CA 94612, Attn.: Lisa Belenky, Senior Attorney.

Desert Survivors is a California nonprofit corporation based in Oakland, California. Desert Survivors is a conservation organization with more than 400 members primarily in California and Nevada, focused on the protection of desert plants, wildlife, and ecosystems. Desert Survivors also engages in a vigorous program of public education about desert lands and their unique character. Desert Survivors’ primary goals are to protect fragile desert lands and to teach visitors to those lands about their value. Desert Survivors leads educational trips to desert lands. Desert Survivors has led more than 400 such trips to the desert including many trips to areas inhabited by the Bi-State Sage-Grouse, including in and near Mono Lake, Bodie, and the White Mountains. Desert Survivors’ contact information is as follows: P.O. Box 20991, Oakland, CA 94620-0091, Attn.: Michelle Bashin, President.

Western Watersheds Project (“WWP”) is an Idaho-based conservation group that was founded in 1993 with the mission of protecting and restoring western watersheds and wildlife on public lands through education, public policy initiatives, and litigation. Headquartered in Hailey, Idaho, WWP has over 12,000 members and supporters, and it has field offices in California and

Nevada that have been actively involved in sage-grouse matters. Since its formation, WWP has actively advocated for statutory and regulatory protection of sagebrush-obligate species, including the Bi-State Sage-Grouse. WWP's contact information is as follows: P.O. Box 1770, Hailey, ID 83333, Attn.: Erik Molvar, Executive Director.

WildEarth Guardians ("Guardians") is a West-wide nonprofit conservation organization with over 65,000 members and activists dedicated to protecting the wildlife, wild places, wild rivers, and health of the American West. Guardians has a longstanding interest in protecting and restoring the Bi-State Sage-Grouse and its habitat in California and Nevada. Guardians's contact information is as follows: WildEarth Guardians, 301 N. Guadalupe, Suite 201, Santa Fe, NM 87501, Attn.: Sarah McMillan, Conservation Director.

VI. Conclusion

This letter provides notice that the Conservation Groups will take the necessary steps to compel the Service to lawfully protect the Bi-State Sage-Grouse and meet its mandatory duties under the ESA and the APA. If the Service does not act to remedy these violations within sixty days, the Conservation Groups will initiate litigation in federal district court against the Service and officials named herein concerning these violations. The Conservation Groups will seek declaratory and injunctive relief and reasonable attorneys' fees and costs. If you would like to discuss these issues or believe that anything stated above is in error, please contact Lisa Belenky, Deborah Sivas, or Matthew J. Sanders at the addresses provided below.

Respectfully submitted,



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